

# EXHIBIT I

**KASOWITZ BENSON TORRES LLP**

1633 BROADWAY  
NEW YORK, NEW YORK 10019-6799  
212-506-1700  
FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2003905

July 14, 2020

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of April 2020  
as reflected on the attached printout.

Fees	\$413,647.00
Less 10% Discount	(41,364.70)
Total Fees	\$372,282.30
Disbursements	2,981.12
<b>TOTAL AMOUNT DUE</b>	<b>\$375,263.42</b>

5401  
12302201

KASOWITZ BENSON TORRES LLP  
1633 BROADWAY  
NEW YORK, NY 10019-6799

Federal I.D. # 13-3720397

APRIL 30, 2020

12302201  
HC2, Inc. d/b/a Hire Counsel  
Hire Counsel v. Delaney

DATE	ATTORNEY OR ASSISTANT	HOURS
04/13/20	MARC E. KASOWITZ Work re Delaney employment matter; t/c JD; t/cs PB, RR.	1.00
04/13/20	RONALD R. ROSSI Preliminary review of Delaney matter materials; t/c w PB; t/c [REDACTED]; [REDACTED] [REDACTED].	1.20
04/13/20	PAUL BURGO T/c w/ [REDACTED] [REDACTED]; t/c w/ M. Kasowitz; t/cs w/ R. Rossi [REDACTED].	2.10
04/13/20	ANDREW MUIR Review materials from P. Burgo and R. Rossi; call with R. Rossi re [REDACTED] [REDACTED].	5.00
04/14/20	MARC E. KASOWITZ Work re strategy.	.30
04/14/20	RONALD R. ROSSI Attention to draft pleadings; numerous teleconferences w/ [REDACTED] [REDACTED], case status and strategy; review and direct legal research and drafting of supporting papers.	6.90
04/14/20	GAVIN D. SCHRYVER T/c with PB and BR re [REDACTED]; review [REDACTED]; review [REDACTED] [REDACTED]; email BR re strategy.	2.30

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04/14/20	PAUL BURGO	.50
	Corr. w/ [REDACTED]; t/c w/ B. Rutcofsky and G. Schryver re [REDACTED] [REDACTED].	
04/14/20	KALITAMARA L. MOODY	6.10
	Conference call with RRR re pleadings; conference call with RRR and A. Muir re [REDACTED]; draft and revise pleadings per RRR; research re [REDACTED] per RR; review [REDACTED] [REDACTED] per RRR.	
04/14/20	ANDREW MUIR	10.60
	Call with R. Rossi re [REDACTED]; continue researching [REDACTED]; begin drafting pleadings.	
04/14/20	GINO C. BARBERA	.50
	Review [REDACTED] with R. Rossi.	
04/15/20	RONALD R. ROSSI	5.70
	Attention to draft pleadings; numerous teleconferences w/ AM, KM to discuss [REDACTED] [REDACTED]; review and direct legal research and drafting of pleadings.	
04/15/20	GAVIN D. SCHRYVER	2.80
	T/c with BR re [REDACTED]; t/c [REDACTED] re [REDACTED]; t/c with [REDACTED]; t/c with RR and BR re [REDACTED] [REDACTED]; t/cs and emails with JB re [REDACTED] [REDACTED].	
04/15/20	PAUL BURGO	.80
	T/c w/ [REDACTED]; review [REDACTED].	
04/15/20	KALITAMARA L. MOODY	10.10
	Draft and revise [REDACTED]; research re [REDACTED] per RRR; conference call with RRR, AM, MS and ML re [REDACTED]; review and analyze pleadings per AM.	
04/15/20	ANDREW MUIR	13.70
	Continue to draft pleadings; call with litigation team re strategy and legal claims for pleadings; conduct research re [REDACTED] [REDACTED] and coordinate additional research and drafting by team members.	

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04/15/20	MAXWELL SANDGRUND	6.60
	Hire Counsel/Delaney: draft and review of [REDACTED] with R. Rossi, A. Muir and K. Moody regarding [REDACTED]; participated in telephone conference with A. Muir and K. Moody regarding [REDACTED]; review of documents and emails for [REDACTED]; draft of email memorandum regarding [REDACTED]; conducted and reviewed legal research regarding [REDACTED].	
04/15/20	JACOB BENSON	7.20
	Discuss matter with G. Schryver; review [REDACTED]; research issues/caselaw re [REDACTED]; correspond re [REDACTED] with G. Schryver; e-mail memo re [REDACTED] to G. Schryver.	
04/16/20	DANIEL R. BENSON	6.50
	Work re pleadings re [REDACTED].	
04/16/20	MARC E. KASOWITZ	.50
	Work re pleadings, strategy.	
04/16/20	RONALD R. ROSSI	5.80
	Review and revise pleadings; numerous discussions with MEK, DB, AM and KM to discuss [REDACTED]; review and direct legal research and drafting pleadings.	
04/16/20	GAVIN D. SCHRYVER	1.30
	T/c with BR re [REDACTED]; emails with JB re [REDACTED].	
04/16/20	KALITAMARA L. MOODY	11.20
	Draft and revise pleadings; draft and revise filing documents per RRR; draft and revise pleadings; additional research re [REDACTED].	
04/16/20	ANDREW MUIR	14.40
	Review comments and revisions to pleadings from D. Benson and attention to incorporating same; review papers to be filed; calls with K. Mooney re [REDACTED]; continue to draft pleadings.	

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04/16/20	MAXWELL SANDGRUND	11.10
	Review of court rules; reviewed legal research regarding [REDACTED]; draft of proposed order; draft of declaration of R. Rossi; draft and review of email correspondence with [REDACTED] regarding filings; participated in telephone conference with [REDACTED]; review and revise pleadings in preparation for filing.	
04/16/20	JACOB BENSON	6.70
	Research on [REDACTED] [REDACTED]; research on [REDACTED] [REDACTED]; research on [REDACTED] [REDACTED]; emails and memo to G. Schryver and B. Rutcofsky re all of the above.	
04/16/20	GINO C. BARBERA	.40
	Review rules and procedure with K. Moody.	
04/17/20	DANIEL R. BENSON	4.70
	Work re pleadings; tc's, emails RR re same.	
04/17/20	MARC E. KASOWITZ	.50
	Work re [REDACTED].	
04/17/20	RONALD R. ROSSI	7.70
	Attention to pleadings; numerous teleconferences w/ [REDACTED] [REDACTED]; review and direct legal research and drafting of supporting papers; t/c w/ [REDACTED] [REDACTED]; discuss same with MEK; t/c with AS-G re motion.	
04/17/20	GAVIN D. SCHRYVER	4.50
	T/c with BR re [REDACTED]; t/c with BR and client team re [REDACTED]; review complaint; revise [REDACTED]; review [REDACTED].	
04/17/20	ANN M. ST. PETER-GRIFFITH	7.00
	Conference with R. Rossi; review [REDACTED] [REDACTED]; reach out to [REDACTED] [REDACTED]; begin working on and researching Motion; draft demand letters.	

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04/17/20	KALITAMARA L. MOODY	8.90
	Draft and revise pleadings per RRR; conference call with RRR and AM; conference call with ASPG, RRR, and AM; review and analyze [REDACTED] [REDACTED] per RRR; draft and revise pleadings per RRR.	
04/17/20	ANDREW MUIR	12.40
	Revise pleadings, review and analyze [REDACTED] [REDACTED]; attention to pleadings.	
04/17/20	MAXWELL SANDGRUND	8.40
	Draft and review of email correspondence with [REDACTED]; participated in telephone conference with [REDACTED] [REDACTED]; draft of [REDACTED] [REDACTED]; review and revise of pleadings in preparation of filing; review of emails in preparation of timeline; review and revise timeline of communications; review of Delaney complaint.	
04/17/20	JACOB BENSON	4.30
	Per G. Schryver request, further case law research on [REDACTED] [REDACTED]; review docket and potentially relevant from [REDACTED] [REDACTED].	
04/17/20	GINO C. BARBERA	2.00
	Review procedural rules and requirements with K. Moody and M. Lawrence.	
04/18/20	DANIEL R. BENSON	7.60
	Work re pleadings.	
04/18/20	MARC E. KASOWITZ	1.70
	Review [REDACTED], draft NY complaint, [REDACTED] [REDACTED]; conf. calls w/[REDACTED]; conf. call w/[REDACTED]; work re status and strategy.	
04/18/20	RONALD R. ROSSI	9.50
	Attention to draft pleadings, [REDACTED] [REDACTED]; numerous discussions w/[REDACTED]; [REDACTED]; MEK and DB, and AM, KM to discuss case status and strategy.	

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04/18/20	ANN M. ST. PETER-GRIFFITH	11.20
	Continue drafting demand letters; research and draft Motion to [REDACTED]; conference call with client, R. Rossi, and M. Kasowitz; call with [REDACTED], R. Rossi and [REDACTED]; conduct research relating to the [REDACTED] concerning [REDACTED] [REDACTED] procedures.	
04/18/20	KALITAMARA L. MOODY	9.20
	Research re [REDACTED]; draft and revise pleadings per RRR; conference call re filings with AM and RRR; research re [REDACTED] per AMt; research re [REDACTED] per ASPG.	
04/18/20	ANDREW MUIR	13.50
	Revise draft [REDACTED]; call with R. Rossi and revise draft pleadings.	
04/18/20	MAXWELL SANDGRUND	10.50
	Draft and review of email correspondence with [REDACTED]; participated in telephone conference with [REDACTED]; review of record in preparation of pleadings; further review and revise of pleadings; conducted and reviewed legal research regarding [REDACTED]; conducted and reviewed legal research regarding [REDACTED].	
04/19/20	DANIEL R. BENSON	5.80
	Work re pleadings.	
04/19/20	MARC E. KASOWITZ	2.20
	Prepare for and participate in conf. call w/[REDACTED]; conf. call w/[REDACTED]; review draft pleadings; internal t/cs.	
04/19/20	RONALD R. ROSSI	7.50
	Attention to draft pleadings; numerous teleconferences w/ [REDACTED] MEK, and AM, KM to discuss [REDACTED]; review and direct legal research and drafting of supporting papers.	

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04/19/20	GAVIN D. SCHRYVER Review caselaw re [REDACTED] [REDACTED]; email JB re same; revise [REDACTED] [REDACTED].	.30
04/19/20	ANN M. ST. PETER-GRIFFITH Continue drafting and editing demand letter to Delaney from HC2; attend conference call with [REDACTED], R. Rossi, M. Kasowitz, D. Benson; review draft pleadings; attend to email with counsel for [REDACTED]; research re [REDACTED] [REDACTED].	9.30
04/19/20	KALITAMARA L. MOODY Draft and revise pleadings per RRR; draft and revise client affidavit per RRR; research re [REDACTED] per RRR; review and analyze draft complaint per RRR.	6.40
04/19/20	ANDREW MUIR Call with R. Rossi and K.Moody; revise proposed order; review and revise draft pleadings in order to file.	8.60
04/19/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; participated in telephone conference with [REDACTED] [REDACTED] regarding [REDACTED]; review and revise pleadings; conducted and reviewed legal research regarding causes of action; conducted and reviewed legal research.	7.20
04/20/20	DANIEL R. BENSON Work re pleadings.	3.50
04/20/20	MARC E. KASOWITZ Review motion papers; review demand letter to Delaney; t/cs DRB.	1.50
04/20/20	RONALD R. ROSSI Attention to draft pleadings; numerous teleconferences w/ [REDACTED]; MEK, and AM, KM to discuss case status and strategy; review and direct legal research and drafting of supporting papers.	7.10

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04/20/20	ANN M. ST. PETER-GRIFFITH Attend to finalizing demand letter; communication with [REDACTED]; attend to email with R. Rossi, MEK and team; review [REDACTED] [REDACTED]; review latest version of pleadings; attend to [REDACTED] email; attend to email with [REDACTED]; review [REDACTED] and [REDACTED] filing; conference with R. Rossi; review [REDACTED] filings.	3.50
04/20/20	KALITAMARA L. MOODY Draft and revise pleadings per RRR; additional research re [REDACTED]; conference call with AM.	9.80
04/20/20	ANDREW MUIR Revise draft pleadings for filing.	6.50
04/20/20	MAXWELL SANDGRUND Draft and review of [REDACTED] [REDACTED]; conducted and reviewed legal research regarding pleadings; draft of client affidavit; review of [REDACTED] to client affidavit.	3.40
04/20/20	JACOB BENSON Further research on [REDACTED] [REDACTED].	4.20
04/20/20	GINO C. BARBERA Review pleadings for K. Moody.	.50
04/21/20	DANIEL R. BENSON Work re pleadings, [REDACTED].	2.70
04/21/20	MARC E. KASOWITZ Work re strategy and papers; work re [REDACTED] [REDACTED]; conf. call w/[REDACTED] [REDACTED] [REDACTED].	2.00
04/21/20	RONALD R. ROSSI Attention to pleadings; numerous teleconferences w/ [REDACTED]; MEK, and AM, KM to discuss case status and strategy; review and direct legal research and drafting of supporting papers.	9.30

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04/21/20	GAVIN D. SCHRYVER	1.30
	Revise memo; t/c with BR re strategy; emails re updates; emails re [REDACTED]; emails with [REDACTED].	
04/21/20	ANN M. ST. PETER-GRIFFITH	9.90
	Review [REDACTED]; attend conference call with [REDACTED] and R. Rossi; review [REDACTED] and draft/edit pleadings; conference with R. Rossi; research [REDACTED] [REDACTED]; attend to team call; conform draft order; review [REDACTED]; attend to edits to Memorandum of Law.	
04/21/20	KALITAMARA L. MOODY	10.20
	Draft and revise pleadings per RRR; research re [REDACTED]; draft, revise, and finalize pleadings for filing per RRR; conference call with RRR, ASPG, and AM re finalizing filings.	
04/21/20	ANDREW MUIR	16.10
	Review revised pleadings containing [REDACTED] [REDACTED], call with R. Rossi re same and draft and revise complaint and accompanying TRO documents for filing.	
04/21/20	MAXWELL SANDGRUND	8.80
	Draft and review of email correspondence with [REDACTED]; draft of [REDACTED]; telephone conference with [REDACTED] team regarding filings; conducted and reviewed legal research; review and revise other filings; conducted and reviewed legal research regarding verified complaint; prepare for filings.	
04/21/20	GINO C. BARBERA	1.20
	Review procedure with K. Moody; conference with R. Rossi about ex parte TRO procedure in the SDNY.	
04/22/20	MARC E. KASOWITZ	1.20
	Work re strategy; work re [REDACTED]; review emails; review [REDACTED]; work re issues.	

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04/22/20	RONALD R. ROSSI	3.50
	Review and finalize pleadings for filing; numerous teleconferences w/ [REDACTED] MEK and DB, and AM, KM to discuss case status and strategy.	
04/22/20	ANN M. ST. PETER-GRIFFITH	8.60
	Continue editing filings; conference call with KBT [REDACTED] re [REDACTED]; review [REDACTED]; attend to email with R. Rossi, the KBT Team and [REDACTED]; draft email to the Court; review court order; draft email to [REDACTED]; review of docket; conference with [REDACTED] attend to email re remittance of documents for service via process server; attend to FEDEX delivery.	
04/22/20	KALITAMARA L. MOODY	3.40
	Draft, revise, and finalize papers for filing per RRR; conference call with RRR, ASPG, and AM re finalizing filings.	
04/22/20	ANDREW MUIR	2.70
	Review revised pleadings containing [REDACTED], [REDACTED], call with R. Rossi re same and revise documents for filing.	
04/22/20	MAXWELL SANDGRUND	4.80
	Draft and review of email correspondence with [REDACTED] [REDACTED] regarding filings; review and revise filings; prepare documents to be filed; telephone conference with [REDACTED] regarding filings; review of court rules.	
04/22/20	JACOB BENSON	2.50
	Further research into [REDACTED].	
04/22/20	GINO C. BARBERA	1.00
	Conference with SDNY clerks about [REDACTED] [REDACTED].	
04/23/20	MARC E. KASOWITZ	.30
	Work re papers and service issues, [REDACTED].	
04/23/20	ANN M. ST. PETER-GRIFFITH	7.40
	Draft email to Delaney for R. Rossi re notice of court order; attend to address research and confirmation; attend to priority mail return receipt for Service copies at Delaney Addresses and travel to Post Office to facilitate U.S. Mail service; attend to Overnight Service via	

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FEDEX; conference with [REDACTED]  
[REDACTED]; attend to conferences and email  
with R. Rossi; attend to email with [REDACTED] KBT  
team.

04/23/20	MAXWELL SANDGRUND Review complaint.	.60
04/23/20	GINO C. BARBERA Compile all commencement papers and motion papers for service for R. Rossi; contact process servers to arrange for service for R. Rossi.	1.20
04/24/20	MARC E. KASOWITZ Work re strategy, dealings w/court.	1.00
04/24/20	RONALD R. ROSSI Meet-and-confer with Delaney's counsel; attention to drafting of proposed stipulation; numerous discussions with [REDACTED] MEK and DB, AS-G, AM and KM re same.	4.40
04/24/20	ANN M. ST. PETER-GRIFFITH Prepare for and attend telephonic counsel for Delaney in conformity with Judge Liman's order; attend to email; prepare draft email for R. Rossi; prepare stipulation and order; calls with R. Rossi.	5.50
04/24/20	KALITAMARA L. MOODY Review relevant agreements for [REDACTED] [REDACTED] per RRR; draft and revise [REDACTED] [REDACTED] per RRR.	2.30
04/24/20	GINO C. BARBERA Research [REDACTED] for A. St. Peter-Griffith and R. Rossi.	.50
04/25/20	ANN M. ST. PETER-GRIFFITH Conference strategizing with R. Rossi; attend to related email.	.60
04/26/20	MARC E. KASOWITZ Review drafts.	.50
04/26/20	RONALD R. ROSSI Draft and revise letter to court, discuss same wi [REDACTED] MEK and DB, AS-G, and AM.	2.40

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04/26/20	ANN M. ST. PETER-GRIFFITH	.80
	Update call with [REDACTED] KBT team; review draft letter to judge.	
04/26/20	KALITAMARA L. MOODY	1.30
	Conference call with ASPG, RRR, and AM; conference call with AM re [REDACTED]; draft and revise preservation notice per RRR; draft and revise insert for letter to Judge Lisman per RRR.	
04/26/20	ANDREW MUIR	3.90
	Call with R. Rossi re [REDACTED] and draft insert for letter to judge.	
04/27/20	MARC E. KASOWITZ	.50
	Work re letter to Judge Liman, strategy.	
04/27/20	RONALD R. ROSSI	3.10
	T/c [REDACTED] re [REDACTED]; revise letter to court re same; additional efforts to meet-and-confer with Delaney; finalize and file letter seeking hearing.	
04/27/20	ANN M. ST. PETER-GRIFFITH	1.80
	Conference with R. Rossi; review letter to Court; attend to email with R. Rossi and KBT team; review [REDACTED]; review email from [REDACTED].	
04/27/20	KALITAMARA L. MOODY	4.20
	Research re procedures per RRR; draft and revise oral argument outline per ARJM; review and analyze motion per ARJM; draft and revise motion per ARJM; research re [REDACTED] in preparation for filing per ARJM.	
04/27/20	ANDREW MUIR	3.60
	Research grounds and procedures for filing; revise draft oral argument outline.	
04/27/20	MAXWELL SANDGRUND	1.10
	Draft and review of email correspondence with [REDACTED] regarding case and strategy; review of letter to court in preparation of filing; review of [REDACTED] to court; review of court rules.	
04/28/20	MARC E. KASOWITZ	.50
	Work re strategy for hearing.	

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04/28/20	RONALD R. ROSSI Prepare for hearing.	1.20
04/28/20	ANN M. ST. PETER-GRIFFITH Attend to email and review related email; review communication to Court; attend to email to [REDACTED]	.60
04/28/20	KALITAMARA L. MOODY Oral argument hearing prep per RRR; research re [REDACTED] per RRR; draft and revise motion per ARJM.	4.30
04/28/20	ANDREW MUIR Draft and revise oral argument outline and accompanying documents for use by R. Rossi at oral argument; draft and revise [REDACTED] [REDACTED].	7.00
04/28/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] team regarding [REDACTED].	.10
04/29/20	RONALD R. ROSSI Prepare for and attend TRO hearing; debrief MEK, DB, [REDACTED] re same and next steps.	4.60
04/29/20	GAVIN D. SCHRYVER Review policies emails re same.	1.20
04/29/20	ANN M. ST. PETER-GRIFFITH Review Delaney opposition; attend to email with R. Rossi; review [REDACTED]; prepare for and attend hearing; draft proposed order; conferences with R. Rossi; draft strategy to do list.	4.70
04/29/20	KALITAMARA L. MOODY Review Delaney submission per RRR.	.10
04/29/20	ANDREW MUIR Analyze defendant's opposition and report to R. Rossi re communications from [REDACTED] [REDACTED].	2.00
04/29/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; review of defendant Delaney's written	2.40

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opposition; review of emails from [REDACTED] in preparation of oral argument; review of case file; draft and review of email correspondence with S. Rattigan regarding case file organization.

04/30/20	RONALD R. ROSSI Attention to discovery schedule; review legal research re [REDACTED]; discussions with AM re same.	1.40
04/30/20	ANN M. ST. PETER-GRIFFITH Strategy conference with R. Rossi re [REDACTED] and next steps; attend to email from [REDACTED]; review [REDACTED].	1.40
04/30/20	KALITAMARA L. MOODY Draft and revise discovery plan per Judge Liman; research re Rule 26(f) per ARJM; draft and revise [REDACTED].	2.60
04/30/20	ANDREW MUIR Draft and revise [REDACTED] and discovery plan and draft action item report for R. Rossi.	4.10
04/30/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; review and revise preservation letter; review and revise case management plan; review and revise discovery strategy; conducted internet research regarding [REDACTED]; review of court order.	2.60
	TOTAL HOURS	529.20

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	HOURS	RATE	AMOUNT
PARTNER			
DANIEL R. BENSON	30.80	1,750.00	53,900.00
PAUL BURGO	3.40	1,075.00	3,655.00
MARC E. KASOWITZ	13.70	1,950.00	26,715.00
RONALD R. ROSSI	81.30	1,150.00	93,495.00
GAVIN D. SCHRYVER	13.70	950.00	13,015.00
ANN M. ST. PETER-GRIFFITH	72.30	705.00	50,971.50
ASSOCIATE			
JACOB BENSON	24.90	625.00	15,562.50
KALITAMARA L. MOODY	90.10	525.00	47,302.50
ANDREW MUIR	124.10	475.00	58,947.50
MAXWELL SANDGRUND	67.60	675.00	45,630.00
MANAGING ATTY			
GINO C. BARBERA	7.30	610.00	4,453.00
TOTAL FEES			\$413,647.00
PROFESSIONAL SERVICES			2,476.91
AUTOMATED RESEARCH			392.07
DOCUMENT REPRODUCTION			35.38
DOCUMENT DELIVERY			76.76
TOTAL COSTS			\$2,981.12
TOTAL FEES AND COSTS			\$416,628.12

KASOWITZ BENSON TORRES LLP

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NEWARK  
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SILICON VALLEY  
WASHINGTON DC

August 11, 2020

Joan Davison  
HC2, Inc. d/b/a Hire Counsel  
225 West Washington Street  
Chicago, IL 60606

Re: Hire Counsel v. Delaney

Dear Joan:

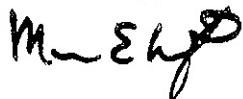
I hope you and your family are safe and well.

I enclose our invoice for professional services rendered and disbursements incurred through May 2020. Also enclosed is a detailed summary of services.

Please let me know if you have any questions.

Best,

Sincerely,



Marc E. Kasowitz

Enclosures

**KASOWITZ BENSON TORRES LLP**

1633 BROADWAY

NEW YORK, NEW YORK 10019-6799

212-506-1700

FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2004998

August 11, 2020

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of May 2020  
as reflected on the attached printout.

Fees	\$470,904.00
Less 10% Discount	(47,090.40)
Total Fees	\$423,813.60
Disbursements	11,645.49
Current Amount Due	\$435,459.09
Previous Balance	327,454.92
<b>TOTAL AMOUNT DUE</b>	<b>\$762,914.01</b>

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12302201

KASOWITZ BENSON TORRES LLP  
1633 BROADWAY  
NEW YORK, NY 10019-6799

Federal I.D. # 13-3720397

MAY 31, 2020

12302201  
HC2, Inc. d/b/a Hire Counsel  
Hire Counsel v. Delaney

DATE	ATTORNEY OR ASSISTANT	HOURS
05/01/20	RONALD R. ROSSI Attention to expedited discovery in Delaney employment matter, PI hearing issues and sealing issues. Numerous t/c w/ KBT team re same; review and edit written discovery and Court correspondence re same.	4.20
05/01/20	ANN M. ST. PETER-GRIFFITH Team conference call re employment matter; strategy for scheduling conference; review draft preservation demand letter; conference with A. Muir; review and revise proposed joint scheduling report and related order; review proposed standard protective order and NDA.	2.70
05/01/20	KALITAMARA L. MOODY Conference call with RRR, ASPG, ARJM, MS, and ML; conference call with ARJM and MS re discovery tasks; draft and revise discovery plan, protective order, and preservation notice in preparation for service per ARJM.	3.60
05/01/20	ANDREW MUIR Calls with R. Rossi and case team regarding next steps in <b>Delaney employment matter</b> and action items for discovery; draft and revise case management plan, stipulation regarding expedited discovery, and begin drafting proposed findings of fact.	9.70
05/01/20	MAXWELL SANDGRUND Draft and review of email correspondence with Hire Counsel team regarding case and strategy; review and revise preservation letter;	5.10

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participated in multiple telephone conferences with [REDACTED] regarding [REDACTED] [REDACTED]; review and revise case management order; review of Judge Liman's rules and proposed sample orders; draft of protective order.

05/02/20	ANN M. ST. PETER-GRIFFITH	.90
	Conference with A. Muir; attend to email with R. Rossi re: strategy for call with Delaney counsel and scheduling order; review draft email from [REDACTED] and attend to related conference.	
05/02/20	ANDREW MUIR	1.60
	Review discovery deadline proposal from opposing counsel and confer with A. St. Peters-Griffith, revise discovery plan and draft response to opposing counsel in furtherance of meet and confer requirement.	
05/02/20	ANDREW MUIR	2.70
	Draft meet and confer correspondence and call with A. St. Peters-Griffith re same; draft correspondence to [REDACTED] re [REDACTED] [REDACTED]; update litigation team re action items.	
05/02/20	MAXWELL SANDGRUND	.30
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED] [REDACTED].	
05/03/20	ANN M. ST. PETER-GRIFFITH	2.10
	Meet and confer conference with R. Rotman, Delaney's counsel re: report of conference of counsel, scheduling order for PI hearing and Delaney employment case, and protective order; conference with A. Muir; review revised report of conference of counsel; conference with B. Choi re: SDNY procedure for non-unilateral submission of conference of counsel; review drafts of proposed orders and conference of counsel.	
05/03/20	MAXWELL SANDGRUND	.90
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED] [REDACTED]; review and revise document requests to [REDACTED] [REDACTED].	

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05/04/20	RONALD R. ROSSI Attention to Delaney employment dispute, preliminary injunction briefing, expedited discovery and sealing issues; t/c with AS-G, AM and KM re same.	4.30
05/04/20	ANN M. ST. PETER-GRIFFITH Conferences with A. Muir; conference call with A. Muir, R. Rossi and K. Moody; review and edit submission to Court for Plaintiff's proposed scheduling order; review Defendants proposal; attend parties' joint conference that Rotman did not attend; conference with [REDACTED]; evaluate next steps for discovery; review Judge's and Local Rules.	5.60
05/04/20	KALITAMARA L. MOODY Conference call with ASPG, ARJM, and [REDACTED] [REDACTED] re document collection; research re SDNY filing protocols; review and analyze documents in preparation for filing per ARJM.	2.40
05/04/20	ANDREW MUIR Finalize joint discovery plan, correspond with opposing counsel, attention to filing plan and draft response letter re meet and confer efforts.	6.20
05/04/20	ANDREW MUIR Call with [REDACTED] re [REDACTED] [REDACTED] with litigation team regarding action items and briefing.	1.60
05/04/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; review of proposed case management orders.	.40
05/04/20	SAMUEL RATTIGAN Work updating case docket folder w/ recent filings re Proposed Scheduling Orders.	.40
05/05/20	RONALD R. ROSSI Attention to Delaney employment dispute, Preliminary Injunction briefing, expedited discovery and sealing issues; t/c with AS-G, AM and KM re same.	4.70

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05/05/20	ANN M. ST. PETER-GRIFFITH	2.10
	Review parties' submissions in advance of scheduling hearing; attend to email from [REDACTED]; attend to KBT team email.	
05/05/20	KALITAMARA L. MOODY	.80
	Conference call with ARJM, MS, and ML re action items.	
05/05/20	ANDREW MUIR	2.30
	Call with litigation team regarding [REDACTED] and [REDACTED] and research; draft report re meet and confer efforts for use by R. Rossi at hearing.	
05/05/20	MAXWELL SANDGRUND	2.40
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; telephone conference with [REDACTED] regarding [REDACTED]; conducted and reviewed federal rules of civil procedure in preparation of discovery requests; review of agreements and [REDACTED] in preparation of discovery requests.	
05/06/20	RONALD R. ROSSI	4.40
	Prepare for and attend telephonic hearing in Delaney employment dispute re PI schedule and Case Management Plan, provide work direction to trial team re PI hearing prep; numerous t/cs w AS-G re same; t/c w [REDACTED] re same; t/c w [REDACTED] re PI hearing issues.	
05/06/20	ANN M. ST. PETER-GRIFFITH	2.60
	Review proposed scheduling orders; prepare for and attend strategy conference call; prepare for and attend telephonic status hearing with Court.	
05/06/20	KALITAMARA L. MOODY	4.30
	Conference call re [REDACTED]; [REDACTED] document collection preparations per ARJM; conference call post-hearing with RRR, ASPG, ARJM, and MS; revise discovery requests per ARJM; draft and revise document collection requests per ARJM; conference calls with ARJM.	

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05/06/20	ANDREW MUIR	6.90
	Prepare for, attend, and follow up re [REDACTED] [REDACTED]; review status of document collection from client and draft response; review and revise proposed offensive discovery.	
05/06/20	MAXWELL SANDGRUND	4.30
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED] [REDACTED]; telephone conference with [REDACTED] [REDACTED] regarding [REDACTED]; draft of all discovery requests; review of local rules in preparation of discovery requests; review of record in preparation of discovery requests.	
05/07/20	RONALD R. ROSSI	2.30
	Prepare issue/evidence outline; discuss same w/ AS-G, provide work direction to AM re PI hearing; correspond w [REDACTED] re same.	
05/07/20	ANN M. ST. PETER-GRIFFITH	3.40
	Attend to email re: hearing on scheduling; review [REDACTED]; conference with R. Rossi; review and edit Requests for Production, Requests for Admission, and Interrogatories.	
05/07/20	KALITAMARA L. MOODY	1.70
	Draft and revise discovery requests per ARJM.	
05/07/20	ANDREW MUIR	6.00
	Complete drafting requests for production, interrogatories and requests for admission; attention to document collection. .	
05/07/20	MAXWELL SANDGRUND	3.10
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED] [REDACTED]; review and revise all discovery requests.	
05/07/20	SAMUEL RATTIGAN	.20
	Update case docket folder w/ recent Protective Order and Proposed Case Management Plan.	
05/08/20	RONALD R. ROSSI	4.80
	Attention to Delaney employment dispute re [REDACTED], expedited discovery and sealing issues; t/c with AS-G, AM and KM re same.	

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05/08/20	ANN M. ST. PETER-GRIFFITH Attend to communications with [REDACTED] at [REDACTED]; review discovery drafts; review Delaney discovery and attend to related email.	2.50
05/08/20	KALITAMARA L. MOODY Draft and revise review protocol per ARJM; draft and revise discovery requests per ARJM.	3.90
05/08/20	ANDREW MUIR Revise and finalize discovery requests for exchange.	3.80
05/08/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding discovery requests; conducted and reviewed applicable rules regarding discovery requests; review of edits to discovery requests; review and revise all discovery requests.	4.20
05/08/20	SAMUEL RATTIGAN Review exhibits ISO Request for Admissions to confirm requests match.	.30
05/09/20	RONALD R. ROSSI Attention to Delany employment dispute re [REDACTED]; t/c with AS-G, AM and KM re same.	1.20
05/09/20	ANN M. ST. PETER-GRIFFITH KBT Team conference call to review discovery.	1.40
05/09/20	KALITAMARA L. MOODY Conference call with RRR, ASPG, and ARJM; call with ARJM; draft revise discovery responses.	2.40
05/09/20	ANDREW MUIR Call with R. Rossi and team regarding [REDACTED] [REDACTED]; draft memorandum re [REDACTED] [REDACTED]; and begin drafting HC2's responses and objections to Delaney's RFAs.	5.40
05/10/20	RONALD R. ROSSI Attention to Delany employment dispute re [REDACTED]; t/c w AS-G, AM and KM re same.	1.40

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05/10/20	KALITAMARA L. MOODY	5.90
	Research re [REDACTED] [REDACTED] per ARJM; conference call with [REDACTED] and ARJM re collection and production; conference call with ARJM; draft and revise R&Os to interrogatories per ARJM; review and analyze initial document collection per ARJM.	
05/10/20	ANDREW MUIR	7.90
	Call with [REDACTED] re [REDACTED] and [REDACTED] [REDACTED], report to R. Rossi re [REDACTED] from [REDACTED], and continue to draft RFA responses as well as responses to interrogatories.	
05/10/20	RICARDO P. MCLEAN	6.50
	Prepare electronic discovery documents for attorney review as requested by associate K. Moody.	
05/11/20	RONALD R. ROSSI	3.30
	Attention to Delany employment dispute re [REDACTED] [REDACTED]; t/c with AS-G, AM and KM re same.	
05/11/20	ANN M. ST. PETER-GRIFFITH	2.60
	Conference call with KBT Team re: [REDACTED] [REDACTED]; strategize for next filings; attend to communication with [REDACTED].	
05/11/20	KALITAMARA L. MOODY	6.10
	Review and analyze [REDACTED] in preparation for production per ARJM; conference call with ARJM re [REDACTED]; conference call with ARJM; review and analyze collections per ARJM.	
05/11/20	ANDREW MUIR	3.90
	Call with [REDACTED] re [REDACTED]; Confer with K. Moody re [REDACTED], review and production; calls with R.Rossi and A. St. Peters-Grifith re [REDACTED] [REDACTED]; draft responses to RFAs.	

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05/11/20	ANDREW MUIR	2.10
	Review and analyze documents collected by [REDACTED] for privilege, confidentiality and responsiveness in order to produce same in response to defendant's requests for production.	
05/11/20	MAXWELL SANDGRUND	.60
	Draft and review of email correspondence with [REDACTED] regarding strategy; review of [REDACTED] discovery demands.	
05/11/20	RICARDO P. MCLEAN	4.30
	Prepare electronic discovery documents for attorney review as requested by associate K. Moody.	
05/12/20	RONALD R. ROSSI	3.40
	Attention to Delaney employment dispute re [REDACTED] [REDACTED]; t/c with AS-G, AM and KM re same.	
05/12/20	ANN M. ST. PETER-GRIFFITH	5.40
	Attend KBT team strategy call; review and revised RFA responses; review draft letter re: [REDACTED]; review and edit draft interrogatory answers.	
05/12/20	KALITAMARA L. MOODY	6.90
	Call with ML re document review; review and analyze documents in preparation for production per ARJM; review correspondence re service of complaint per ARJM.	
05/12/20	ANDREW MUIR	5.90
	Call with litigation team re document collection and review and strategy for disclosing documents and review by [REDACTED] [REDACTED]; revise responses and objections to Delaney's RFAs, .	
05/12/20	ANDREW MUIR	2.20
	Complete researching and drafting [REDACTED] responses and objections to Delaney's RFAs.	
05/12/20	MAXWELL SANDGRUND	1.80
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; telephone conference with A. Muir regarding [REDACTED]	

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[REDACTED]; review of client documents in preparation of [REDACTED] affidavit.

05/12/20	RICARDO P. MCLEAN Attend to the preparation of electronic discovery documents for attorney review as requested by associate K. Moody.	3.70
05/13/20	RONALD R. ROSSI Attention to Delaney employment dispute re [REDACTED] [REDACTED]; t/c with AS-G, AM and KM re same.	4.20
05/13/20	ANN M. ST. PETER-GRIFFITH Review draft responses to RFPs; attend to email with team re production and other discovery responses; review various drafts of discovery answers; review production plan; call with K. Moody; review Delaney production; attend conference call with KBT Team; review latest draft of letter to Court re: [REDACTED] [REDACTED]; review answer and counterclaims.	4.80
05/13/20	KIRSTEN C. JACKSON Review pleadings, [REDACTED] for Delaney employment dispute matter.	4.50
05/13/20	KALITAMARA L. MOODY Review and analyze documents in preparation for production; draft and revise production letter; review and analyze Delaney's R&Os per ASPG; conference call with RRR, ASPG, and ARJM.	6.60
05/13/20	ANDREW MUIR Calls with [REDACTED], and litigation team re [REDACTED] [REDACTED]; serve discovery responses.	6.50
05/13/20	ANDREW MUIR Review production of documents from Delaney and begin revising draft [REDACTED] declaration.	7.10
05/13/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; review of client documents in preparation of Hire Counsel affidavit; review of internet research regarding [REDACTED] and covid-19 in preparation of [REDACTED] affidavit; draft of [REDACTED]	5.80

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affidavit on behalf of [REDACTED]  
[REDACTED].

05/13/20	SAMUEL RATTIGAN	.30
	Review/monitor the Court's docket to confirm deadlines calendared on same match internally calendared deadlines and work updating case Docket folder w/ recently filed Answer.	
05/13/20	RICARDO P. MCLEAN	6.60
	Assist case team with the preparation of discovery documents for attorney review and production as requested by associate K. Moody.	
05/14/20	MARC E. KASOWITZ	.50
	Review counterclaims, media.	
05/14/20	RONALD R. ROSSI	4.90
	Attention to Delaney employment dispute re [REDACTED] [REDACTED]; t/c with AS-G, AM and KM re same.	
05/14/20	ANN M. ST. PETER-GRIFFITH	3.70
	Review and revise draft of [REDACTED] affidavit; review edits to in camera review letter; attend to email re: [REDACTED]; begin preparing [REDACTED]; KBT Team call.	
05/14/20	KIRSTEN C. JACKSON	3.90
	Review [REDACTED] policies; draft notices of claim.	
05/14/20	KALITAMARA L. MOODY	6.10
	Review and analyze documents in preparation for production per ARJM; draft and revise [REDACTED] declaration per ARJM; conference call with RRR, ASPG, .	
05/14/20	ANDREW MUIR	5.70
	Finalize [REDACTED] declaration, review production set [REDACTED], confer with R. Rossi and litigation team re [REDACTED] [REDACTED].	
05/14/20	ANDREW MUIR	4.00
	Review production of documents from Delaney and begin revising draft [REDACTED] declaration.	

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05/14/20	MAXWELL SANDGRUND	5.20
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; telephone conference with [REDACTED] regarding [REDACTED]; review and revise client declaration; review of client production in preparation of client declaration; review of [REDACTED] edits to client declaration.	
05/14/20	RICARDO P. MCLEAN	5.30
	Prepare discovery documents for attorney review as requested by associate K. Moody.	
05/15/20	MARC E. KASOWITZ	.30
	Review emails.	
05/15/20	RONALD R. ROSSI	6.70
	Attention to Delaney employment dispute re [REDACTED] [REDACTED]; attention to completion of [REDACTED], t/c with AS-G, AM and KM re same, t/c [REDACTED] re same.	
05/15/20	ANN M. ST. PETER-GRIFFITH	4.30
	Review of various drafts of [REDACTED] declaration; attend to email; review verified complaint for consistency; review revisions from [REDACTED]; review of declaration from Delaney's attorney and attachments thereto and compare to [REDACTED]; review [REDACTED] declaration; .	
05/15/20	KIRSTEN C. JACKSON	2.90
	Review and revise [REDACTED].	
05/15/20	KALITAMARA L. MOODY	5.10
	Review and analyze production per ARJM; draft and revise production letter; conference call re [REDACTED] with RRR, ASPG, ARJM.	
05/15/20	ANDREW MUIR	11.10
	Finalize [REDACTED] declaration for service, including coordinate revisions from [REDACTED] [REDACTED]; confer with opposing counsel re declaration exchanges; call with litigation team re strategy [REDACTED] [REDACTED].	

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05/15/20	MAXWELL SANDGRUND	5.20
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; prepare [REDACTED] declaration for filing; review and revise declaration; review and revise letter motion regarding in camera review; review of Delaney document production in preparation of filing; review of [REDACTED] document production in preparation of filing.	
05/15/20	SAMUEL RATTIGAN	.20
	Work updating docket file w/ Declaration ISO of Preliminary Injunction.	
05/15/20	RICARDO P. MCLEAN	3.80
	Assist case team with the preparation of discovery documents for attorney review and production as requested by associate K. Moody.	
05/16/20	MARC E. KASOWITZ	.50
	Review emails re [REDACTED].	
05/16/20	RONALD R. ROSSI	1.30
	Attention to Delaney employment dispute re [REDACTED]; revise letter to court re same.	
05/16/20	ANN M. ST. PETER-GRIFFITH	.70
	Draft revisions to letter to Court re: [REDACTED]; conference with K. Moody; attend to related email.	
05/16/20	KALITAMARA L. MOODY	2.90
	Preliminary injunction briefing prep.	
05/16/20	RICARDO P. MCLEAN	4.30
	Prepare electronic discovery documents for attorney review as requested by associate K. Moody.	
05/17/20	MARC E. KASOWITZ	.30
	Review papers.	
05/17/20	ANN M. ST. PETER-GRIFFITH	3.20
	Revise initial disclosures; conference with R. Rossi.	
05/17/20	ANDREW MUIR	6.20
	Draft initial disclosures, research [REDACTED] [REDACTED] and research and draft [REDACTED] letter.	

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05/18/20	MARC E. KASOWITZ T/c RR re [REDACTED]; review emails.	.50
05/18/20	RONALD R. ROSSI T/c w MEK re [REDACTED] [REDACTED]; draft and revise letter to SDNY re [REDACTED] [REDACTED]; t/c w AS-P, AM and KM re initial disclosures and PI work; prepare [REDACTED] for deposition; [REDACTED] [REDACTED]; review initial disclosures.	8.20
05/18/20	ANN M. ST. PETER-GRIFFITH Attend to email with R. Rossi and [REDACTED]; review Court order re: [REDACTED]; review/edit letter response to Court; review [REDACTED]; call with R. Rossi; attend to email with [REDACTED]; KBT Team call; review [REDACTED] [REDACTED]; call with R. Rossi and [REDACTED] in preparation for deposition; [REDACTED] [REDACTED].	4.90
05/18/20	KALITAMARA L. MOODY Draft and revise [REDACTED] motion per ARJM; draft and revise letter response to Rotman 5.15 letter per ASPG; research re [REDACTED] per ASPG; conference call with RRR, ASPG, and ARJM re status and to-do list; review and analyze exhibits to the declaration of [REDACTED] per ARJM.	5.90
05/18/20	ANDREW MUIR Continue to draft [REDACTED] letter.	1.10
05/18/20	ANDREW MUIR Review Court's orders regarding multiple letter motions; [REDACTED] [REDACTED]; revise initial disclosures and strategy call with litigation team regarding [REDACTED]; call with [REDACTED] [REDACTED], and begin drafting proposed findings of fact.	7.60
05/18/20	MAXWELL SANDGRUND Draft and review of email correspondence with [REDACTED] regarding filings; [REDACTED] [REDACTED]; review of defendant	1.80

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declarations; review of court filings regarding [REDACTED].

05/18/20	SAMUEL RATTIGAN	.40
	Monitor/review the Court's docket and work updating case Docket file re [REDACTED] [REDACTED] [REDACTED].	
05/18/20	RICARDO P. MCLEAN	.50
	Prepare deposition transcripts for attorney review as requested by K. Moody.	
05/19/20	MARC E. KASOWITZ	.50
	[REDACTED].	
05/19/20	RONALD R. ROSSI	7.10
	Prepare for and defend [REDACTED] deposition, t/c w/ trial team to discuss status and strategy; t/c w/ [REDACTED] re [REDACTED]; attention to revision of [REDACTED] letter briefs and completion of [REDACTED] applications.	
05/19/20	ANN M. ST. PETER-GRIFFITH	6.90
	Team call with A. Muir and K. Moody; [REDACTED]; review proposed letter motion re: [REDACTED]; KBT Team call; [REDACTED]; conference to discuss [REDACTED] and [REDACTED]; review [REDACTED] motion to file under seal declaration; [REDACTED] [REDACTED].	
05/19/20	KALITAMARA L. MOODY	9.10
	Call with ASPG and ARJM re [REDACTED]; draft and revise motion to seal per ARJM; research re [REDACTED] per ASPG; sealing application; draft and revise conclusions of law.	
05/19/20	ANDREW MUIR	12.70
	Research [REDACTED] [REDACTED]; calls with A. St. Peters-Griffith, M. Sandgrund, R. Rossi and K. Moody re s [REDACTED]; continue to draft proposed findings of fact.	

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05/19/20	MAXWELL SANDGRUND	4.10
	Draft and review of email correspondence with [REDACTED] regarding [REDACTED]; telephone conference with A. Muir regarding legal research; conducted and reviewed legal research regarding [REDACTED]; [REDACTED]; draft of letter to court regarding [REDACTED].	
05/19/20	SAMUEL RATTIGAN	.90
	Update Docket filings related to Plaintiffs Motion for Preliminary Injunction and Opposition to same.	
05/20/20	ANN M. ST. PETER-GRIFFITH	10.70
	Review and revise letter motion to strike Rotman declaration; conference with R. Rossi; draft and revise proposed findings of fact and conclusions of law; review court's orders; attend to email to Rotman; review proposed findings of fact [REDACTED]; review [REDACTED] and R. Rossi designations.	
05/20/20	KALITAMARA L. MOODY	7.60
	Draft and revise conclusions of law per ARJM; draft and revise findings of fact per ARJM.	
05/20/20	ANDREW MUIR	11.80
	Revise draft letter motion to strike the Rotman affirmation; call with A. St. Peters-Griffith re proposed findings of fact and continue to draft proposed findings of fact, including review declarations and deposition testimony, and coordinate with litigation team regarding action items.	
05/20/20	MAXWELL SANDGRUND	8.80
	Draft and review of email correspondence with [REDACTED] and the [REDACTED] regarding [REDACTED]; telephone conference with [REDACTED] regarding [REDACTED]; review of declarations in preparation of preliminary injunction brief; review of deposition transcripts in preparation of preliminary injunction brief; review of record and court docket in preparation of preliminary injunction brief; draft of preliminary injunction brief.	

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05/20/20	SAMUEL RATTIGAN	.90
	Work re [REDACTED]; continue work updating docket file w/ filings related to Plaintiffs Motion for Preliminary Injunction and Opposition to same; review/monitor the Court's docket and work updating case file.	
05/21/20	MARC E. KASOWITZ	.30
	Review proposed findings of fact and conclusion of law re [REDACTED]	
05/21/20	ANN M. ST. PETER-GRIFFITH	10.50
	Continue reviewing and editing Proposed Findings of Fact and Conclusions of Law re [REDACTED]; review and revise memorandum of law; KBT team call; call with Attorney Rotman for court ordered meet and confer; identify transcript pages for submission.	
05/21/20	KALITAMARA L. MOODY	8.60
	Research and draft and revise conclusions of law; draft and revise proposed findings of fact; preparations for filing.	
05/21/20	ANDREW MUIR	5.10
	Draft proposed findings of fact re evidence from [REDACTED].	
05/21/20	ANDREW MUIR	9.90
	Prepare for call and meet and confer with R. Rotman re sealing procedures; review and revise draft memorandum of law and proposed findings of fact.	
05/21/20	MAXWELL SANDGRUND	8.80
	Draft and review of email correspondence with [REDACTED] regarding legal research and filings; further draft of preliminary injunction brief; review of proposed conclusions of law; review of proposed findings of fact; review of factual record in preparation of filing; review and revise of proposed facts and conclusions of law; review of edits to briefs.	
05/21/20	AMANDA NUNEZ	3.20
	Phone call with K. Moody; Prepare Preliminary Injunction Motion exhibits.	

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
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05/21/20	SAMUEL RATTIGAN	1.90
	Work updating documents in case file w/ [REDACTED] and work monitoring the Court's docket to update Docket file.	
05/22/20	MARC E. KASOWITZ	.40
	Review filings and draft motion.	
05/22/20	RONALD R. ROSSI	5.30
	Attention to Delaney employment dispute re [REDACTED], review and revise PI memo of law and supporting papers; discuss same with AM and AS-G.	
05/22/20	ANN M. ST. PETER-GRIFFITH	7.10
	Review draft memorandum of law; remit email to R. Rotman re: designation of deposition transcript pages; [REDACTED]; attend to email with R. Rotman, Defense counsel re: parties' joint submission of deposition excerpts; review notice of motion; review Rossi declaration; review filing submitted by Delaney and identify cited exhibits; [REDACTED] [REDACTED].	
05/22/20	KALITAMARA L. MOODY	8.30
	Draft and revise proposed findings of fact and conclusions of law per ARJM; assist with preliminary injunction filing per ARJM.	
05/22/20	ANDREW MUIR	2.30
	Complete revising draft MOL and confirming record citations.	
05/22/20	ANDREW MUIR	7.60
	Draft Rossi declaration for filing and attention to finalizing all other papers for filing on the public docket and under seal.	
05/22/20	MAXWELL SANDGRUND	10.30
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding [REDACTED]; review and revise of proposed facts and conclusions of law; review of exhibits in preparation of filing and sealing; conducted and reviewed legal research [REDACTED]; draft of notice of motion in preparation of filing; prepare exhibits for filing.	

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05/22/20	AMANDA NUNEZ Preparation for Preliminary Injunction Motion filing.	4.10
05/22/20	SAMUEL RATTIGAN Work updating docket folder w/ recent filings related to HC2's Motion for Preliminary Injunction and work quality checking exhibits ISO of same to confirm correct exhibits filed.	2.60
05/22/20	RICARDO P. MCLEAN Prepare discovery documents for court filing as requested by A. Nunez.	.80
05/23/20	KALITAMARA L. MOODY Draft Preliminary Injunction hearing outline per ARJM.	2.30
05/23/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] regarding oral argument preparation.	.50
05/24/20	KALITAMARA L. MOODY Draft case timeline for PI hearing; oral argument outline drafting.	3.30
05/24/20	ANDREW MUIR Draft oral argument preparation materials, including chart of contract provisions and revise argument outline, chronology and evidence of improper disclosures.	5.60
05/24/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] regarding [REDACTED]; review of [REDACTED]; review of [REDACTED]; declaration and deposition; [REDACTED] [REDACTED].	2.30
05/25/20	RONALD R. ROSSI Prepare for PI hearing re Delaney employment dispute.	2.70
05/25/20	KALITAMARA L. MOODY Preliminary Injunction hearing preparations per ARJM.	3.10

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05/25/20	ANDREW MUIR	2.50
	Review authorities cited [REDACTED] in order to update R. Rossi re same in preparation for preliminary injunction hearing.	
05/25/20	MAXWELL SANDGRUND	.60
	Review of email correspondence from [REDACTED] regarding oral argument preparation; review of case summaries in preparation of oral argument.	
05/26/20	MARC E. KASOWITZ	.50
	Work re oral argument and report.	
05/26/20	RONALD R. ROSSI	5.60
	Prepare for and attend PI hearing re Delaney employment dispute; debrief w AS-G, MEK, [REDACTED] re same.	
05/26/20	ANN M. ST. PETER-GRIFFITH	3.10
	Conference with R Rossi; attend preliminary injunction hearing re Delaney employment dispute; conference with K. Moody and A. Muir.	
05/26/20	ANDREW MUIR	4.10
	Review counterclaims and begin researching grounds to dismiss in preparation for drafting motion to dismiss; prepare materials for and attend preliminary injunction hearing re Delaney employment dispute.	
05/26/20	MAXWELL SANDGRUND	1.20
	Draft and review of email correspondence [REDACTED] regarding oral argument; review of court rules regarding oral argument; review of defendant's counterclaims; review of court updates.	
05/26/20	SAMUEL RATTIGAN	1.30
	Continue work updating case Docket file w/ recently filed exhibits ISO of HC2's Motion for Preliminary Injunction and work updating and organizing all documents filed under seal.	
05/27/20	MARC E. KASOWITZ	.30
	Work re Judge Liman decision; work re [REDACTED].	

HC2, Inc. d/b/a Hire Counsel  
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05/27/20	RONALD R. ROSSI Attend PI hearing re Delaney employment dispute; numerous discussions debriefing re same.	1.80
05/27/20	ANN M. ST. PETER-GRIFFITH Attend to email re: [REDACTED] [REDACTED]; draft letter to Court and assemble case exhibits; [REDACTED]; attend conference with Court announcing order; attend to email re: [REDACTED]; conference with R. Rossi re: [REDACTED]; [REDACTED].	4.10
05/27/20	KALITAMARA L. MOODY Draft and revise letter to the Court per ASPG.	.60
05/27/20	ANDREW MUIR Attend hearing re order on application for preliminary injunction.	1.10
05/27/20	ANDREW MUIR Research causes of action alleged in counterclaims in preparation for motion to dismiss.	3.00
05/27/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] regarding oral argument; review of legal research regarding potential motion to dismiss of counterclaims.	.80
05/28/20	RONALD R. ROSSI Attention to MTD Delaney counterclaims; discuss same w AM and AS-G.	1.20
05/28/20	ANN M. ST. PETER-GRIFFITH Conference with R. Rotman re: [REDACTED] [REDACTED]; KBT team call re: counterclaims; [REDACTED].	1.40
05/28/20	ANDREW MUIR Attention to response to [REDACTED] re [REDACTED]; attention to ordering transcript of PI order; correspond with M. Sandgrund re [REDACTED]; calls with A. St. Peters-Griffith and R. Rossi re strategy for responding to complaint; meet and confer call with R. Rotman re [REDACTED].	2.40

HC2, Inc. d/b/a Hire Counsel  
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05/28/20	MAXWELL SANDGRUND	7.80
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding [REDACTED]; review of [REDACTED] in preparation of legal research; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss.	
05/29/20	RONALD R. ROSSI	2.30
	Attention to MTD.	
05/29/20	ANN M. ST. PETER-GRIFFITH	2.30
	Team call re: Motion to Dismiss strategy re Delaney's counterclaims; attend to email with [REDACTED]; attend to email with R. Rossi; draft response email to R. Rotman re: enlargement; conference call with [REDACTED] [REDACTED]; conference call with R. Rotman concerning enlargement.	
05/29/20	KALITAMARA L. MOODY	1.40
	[REDACTED] conference call re motion to dismiss Delaney's counterclaims; conference call with ARJM and MS re motion to dismiss.	
05/29/20	ANDREW MUIR	4.00
	Research case law re motions to dismiss Delaney's counterclaims and correspond with case team re research and drafting strategy.	
05/29/20	MAXWELL SANDGRUND	11.40
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding motion to dismiss Delaney's counterclaims; participated in telephone conferences [REDACTED] regarding motion to dismiss; review of counterclaims in preparation of motion to dismiss; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss; draft of motion to dismiss.	
05/29/20	SAMUEL RATTIGAN	.70
	Review/monitor the Court's Docket in order to confirm internal Docket file to be updated w/ all filings and confirm all upcoming hearings dates are on calendar.	
05/30/20	ANDREW MUIR	5.30
	Revise draft motion to dismiss and call with M. Sandgrund re same.	

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05/30/20	MAXWELL SANDGRUND	12.20
	Draft and review of email correspondence [REDACTED] regarding motion to dismiss; participated in telephone conferences with A. Muir regarding motion to dismiss; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss; further draft of motion to dismiss.	
05/31/20	KALITAMARA L. MOODY	4.30
	Draft and revise motion to dismiss Delaney's counterclaims per ARJM.	
05/31/20	ANDREW MUIR	11.90
	Research re Delaney's counterclaims and revise draft motion to dismiss the same.	
05/31/20	MAXWELL SANDGRUND	10.10
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding motion to dismiss Delaney' counterclaims; conducted and reviewed legal research regarding [REDACTED] in preparation of motion to dismiss; further draft of motion to dismiss.	
	TOTAL HOURS	692.90

HC2, Inc. d/b/a Hire Counsel  
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	HOURS	RATE	AMOUNT
<b>PARTNER</b>			
KIRSTEN C. JACKSON	11.30	600.00	6,780.00
MARC E. KASOWITZ	4.10	1,950.00	7,995.00
RONALD R. ROSSI	85.30	1,150.00	98,095.00
ANN M. ST. PETER-GRIFFITH	99.00	705.00	69,795.00
<b>ASSOCIATE</b>			
KALITAMARA L. MOODY	113.20	825.00	93,390.00
ANDREW MUIR	206.80	475.00	98,230.00
MAXWELL SANDGRUND	120.00	675.00	81,000.00
<b>PARALEGAL</b>			
RICARDO P. MCLEAN	35.80	315.00	11,277.00
AMANDA NUNEZ	7.30	325.00	2,372.50
SAMUEL RATTIGAN	10.10	195.00	1,969.50
 <b>TOTAL FEES</b>			 \$470,904.00
<b>FILING FEES</b>			400.00
<b>PROFESSIONAL SERVICES</b>			5,523.15
<b>AUTOMATED RESEARCH</b>			5,331.32
<b>DOCUMENT REPRODUCTION</b>			391.02
 <b>TOTAL COSTS</b>			 \$11,645.49
 <b>TOTAL FEES AND COSTS</b>			 \$482,549.49



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Kasowitz Benson Torres LLP  
1633 Broadway  
New York, NY 10019

MARC E. KASOWITZ  
K12302201

INVOICE NUMBER 2003622

May 31, 2020

**RE: HC2, Inc. d/b/a Hire Counsel / Hire Counsel v. Delaney**

FOR INVESTIGATIVE SERVICES rendered through May 15, 2020

	HOURS	RATE	AMOUNT
05/15/2020 Investigative Duties.	7.50	350.00	2,625.00
TOTAL HOURS/AMOUNT	7.50		\$2,625.00

<b>TOTAL DISBURSEMENTS</b>	\$2,447.93
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FEES	\$2,625.00
DISBURSEMENTS	2,447.93
SALES TAX	450.22
<b>TOTAL AMOUNT DUE</b>	<b>\$5,523.15</b>

INTELLIGENCE OPTIONS LLC IS A SUBSIDIARY COMPANY OF THE LAW  
FIRM KASOWITZ BENSON TORRES LLP

KASOWITZ BENSON TORRES LLP

MARC E. KASOWITZ  
DIRECT DIAL: 212-506-1710  
DIRECT FAX: 212-835-5010  
MKASOWITZ@KASOWITZ.COM

1633 BROADWAY  
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ATLANTA  
HOUSTON  
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MIAMI  
NEWARK  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON DC

September 25, 2020

Joan Davison  
HC2, Inc. d/b/a Hire Counsel  
225 West Washington Street  
Chicago, IL 60606

Re: Hire Counsel v. Delaney

Dear Joan:

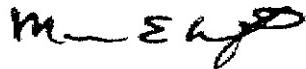
I hope you and your family are safe and well.

I enclose our invoice for professional services rendered and disbursements incurred from June through July 2020. Also enclosed is a detailed summary of services.

Please let me know if you have any questions.

Best.

Sincerely,



Marc E. Kasowitz

Enclosures

**KASOWITZ BENSON TORRES LLP**

1633 BROADWAY  
NEW YORK, NEW YORK 10019-6799  
212-506-1700  
FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2005911

September 25, 2020

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of July 2020  
as reflected on the attached printout.

Fees	\$153,922.50
Less 10% Discount	(15,392.25)
Total Fees	\$138,530.25
Disbursements	2,686.31
Current Amount Due	\$141,216.56
Previous Balance	467,914.01
<b>TOTAL AMOUNT DUE</b>	<b>\$609,130.57</b>

5401  
12302201

KASOWITZ BENSON TORRES LLP  
1633 BROADWAY  
NEW YORK, NY 10019-6799

Federal I.D. # 13-3720397

JULY 31, 2020

12302201  
HC2, Inc. d/b/a Hire Counsel  
Hire Counsel v. Delaney

DATE	ATTORNEY OR ASSISTANT	HOURS
06/01/20	RONALD R. ROSSI Review and revise draft MTD; legal research re same; t/c w AS-G and AM re same; attention to sealing issues.	7.80
06/01/20	ANN M. ST. PETER-GRIFFITH Review Motion to Dismiss draft; email Attorney Rotman re: meet and confer concerning sealing; [REDACTED]; strategy call with A. Muir; meet and confer with Delaney counsel; conference with R. Rossi;.	2.80
06/01/20	ANDREW MUIR Research and revise draft motion to dismiss counterclaims.	6.80
06/01/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] [REDACTED] regarding motion to dismiss; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss; review and revise motion to dismiss.	3.40
06/02/20	RONALD R. ROSSI Draft MTD; legal research re same; numerous t/cs w AM re same; AS-G re sealing issues; t/c w [REDACTED]; t/c w [REDACTED] re status and strategy.	8.90
06/02/20	ANN M. ST. PETER-GRIFFITH Continue revising/editing Motion to Dismiss; [REDACTED].	2.30

HC2, Inc. d/b/a Hire Counsel  
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06/02/20	KIRSTEN C. JACKSON Draft correspondence to [REDACTED].	1.00
06/02/20	KALITAMARA L. MOODY Research in preparation for moving to dismiss per ARJM.	2.30
06/02/20	ANDREW MUIR Research and revise motion to dismiss counterclaims; call with R.Rossi re arguments in motion to dismiss.	9.60
06/02/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] regarding motion to dismiss; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss; review of court rules in preparation of motion to dismiss.	3.10
06/02/20	MATTHEW LAWRENCE Review [REDACTED] Case Law; correspond with A. Muir, K. Moody, and M. Sandgrund regarding same.	2.00
06/03/20	MARC E. KASOWITZ Review correspondence.	.20
06/03/20	RONALD R. ROSSI Draft MTD and finalize supporting papers; t/c w AM re same; attention to [REDACTED]; t/c with AS-G re same; t/c w [REDACTED] re same.	6.20
06/03/20	ANN M. ST. PETER-GRIFFITH Prepare letter to court re: sealing and scheduling; evaluate what will be unsealed; attend to [REDACTED]; conference with [REDACTED]; review and provide comments re: Motion to Dismiss; attending to drafting/editing proposed order.	6.40
06/03/20	KALITAMARA L. MOODY Draft and revise motion to dismiss per ARJM; draft and revise letter motion to seal per ASPG.	5.90
06/03/20	ANDREW MUIR Conduct additional research re [REDACTED] sections alleged in counterclaims and revise draft motion to dismiss.	9.10

HC2, Inc. d/b/a Hire Counsel  
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06/03/20	MAXWELL SANDGRUND	12.40
	Draft and review of email correspondence [REDACTED] regarding motion to dismiss; review and revise motion to dismiss; prepare motion to dismiss for filing; draft of notice of motion; conducted and reviewed legal research regarding counterclaims in preparation of motion to dismiss.	
06/03/20	SAMUEL RATTIGAN	.90
	Draft shell of declaration of R. Rossi ISO HC2's Motion to Dismiss Counterclaims; work finalizing exhibits ISO of Motion to Dismiss Counterclaims.	
06/04/20	MARC E. KASOWITZ	.50
	Review correspondence; work re strategy.	
06/04/20	ANN M. ST. PETER-GRIFFITH	.60
	Review notice from Court re: proposed order; review redactions and attend to related email; .	
06/04/20	MAXWELL SANDGRUND	.10
	Review of docket.	
06/04/20	SAMUEL RATTIGAN	.70
	Work updating docket file w/ HC2's motion to dismiss Defendant's counter-claims; review/monitor the court's docket in order to confirm docket file to be up to date.	
06/05/20	ANN M. ST. PETER-GRIFFITH	.10
	Attend to email with [REDACTED] re: response from Delaney to our letter motion concerning sealing.	
06/05/20	MAXWELL SANDGRUND	.20
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding legal research.	
06/06/20	MATTHEW LAWRENCE	1.80
	Research case law concerning [REDACTED] [REDACTED].	
06/08/20	KIRSTEN C. JACKSON	.70
	Review and revise correspondence to [REDACTED].	
06/08/20	MAXWELL SANDGRUND	3.60
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding [REDACTED]; conducted and reviewed legal research regarding	

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
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Jul 31, 2020

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[REDACTED]		
06/08/20	MATTHEW LAWRENCE	1.70
	Research case law concerning [REDACTED]	
	[REDACTED] and correspond with	
	A. Muir, K. Moody, and M. Sandgrund regarding	
	same.	
06/09/20	RONALD R. ROSSI	.30
	T/c with [REDACTED] re [REDACTED]	
06/09/20	KIRSTEN C. JACKSON	.50
	Review and revise correspondence to [REDACTED]	
06/09/20	MAXWELL SANDGRUND	1.20
	Review of Delaney answer; conducted and	
	reviewed legal research regarding [REDACTED]	
[REDACTED]		
06/10/20	MARC E. KASOWITZ	.30
	Review emails.	
06/10/20	KIRSTEN C. JACKSON	.50
	Review and revise correspondence to [REDACTED]	
06/10/20	ANDREW MUIR	.60
	Prepare documents in response to request [REDACTED]	
	[REDACTED] and attention to transmitting same.	
06/12/20	ANDREW MUIR	.60
	Attention to research re [REDACTED]	
[REDACTED]		
06/12/20	MAXWELL SANDGRUND	4.30
	Draft and review of email correspondence with	
	A. Muir regarding [REDACTED]; conducted and	
	reviewed legal research regarding [REDACTED]	
[REDACTED]		
06/14/20	KALITAMARA L. MOODY	1.30
	Review [REDACTED]	
	[REDACTED] per ARJM.	
06/15/20	ANN M. ST. PETER-GRIFFITH	.70
	Attend to email with [REDACTED] re:	
	[REDACTED]; conference with	
	K. Moody re: same; attend to team email re:	
[REDACTED]		

HC2, Inc. d/b/a Hire Counsel  
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Jul 31, 2020

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06/15/20	ANDREW MUIR Attention to research regarding [REDACTED] [REDACTED].	2.60
06/15/20	MAXWELL SANDGRUND Draft and review of email correspondence with A. Muir regarding legal research; conducted and reviewed legal research regarding [REDACTED] [REDACTED].	3.30
06/16/20	ANN M. ST. PETER-GRIFFITH Conference with R. Rossi; attend to email to [REDACTED] re: [REDACTED] [REDACTED].	.30
06/16/20	ANDREW MUIR Attention to deposition confidentiality designations [REDACTED] re same.	.60
06/16/20	ANDREW MUIR Call with M. Sandgrund re [REDACTED] [REDACTED].	1.00
06/16/20	MAXWELL SANDGRUND Draft and review of email correspondence with A. Muir regarding legal research; telephone conference with A. Muir regarding legal research; conducted and reviewed legal research regarding personal service requirements; draft of letter to defendant's counsel regarding personal service.	4.80
06/17/20	ANN M. ST. PETER-GRIFFITH Attend to email re: [REDACTED] [REDACTED]; conference with [REDACTED] [REDACTED].	.40
06/17/20	ANDREW MUIR Attention to submitting [REDACTED] [REDACTED] to [REDACTED]; research [REDACTED] [REDACTED] and begin revising draft letter to opposing counsel; conference with A. St.Peters-Griffith re same.	3.40
06/17/20	MAXWELL SANDGRUND Draft and review of email correspondence with A. Muir regarding [REDACTED]; conducted and reviewed legal research [REDACTED] [REDACTED].	1.30

HC2, Inc. d/b/a Hire Counsel  
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INVOICE NO.: 2005911

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06/18/20	RONALD R. ROSSI	1.50
	Review opposition to MTD, discuss same with AM and AS-G.	
06/18/20	ANN M. ST. PETER-GRIFFITH	1.10
	Review opposition to motion to dismiss counterclaims; team conference call; attend to email from K. Moody re: [REDACTED] [REDACTED].	
06/18/20	KALITAMARA L. MOODY	1.40
	Prepare for and attend call re [REDACTED] [REDACTED] with RRR, ASPG, ARJM, and MS; review Delaney opposition to motion to dismiss per ARJM.	
06/18/20	ANDREW MUIR	1.70
	Begin analyzing opposition to motion to dismiss and call with litigation team regarding reply.	
06/18/20	ANDREW MUIR	2.40
	Analyze research regarding [REDACTED] and revise draft letter to Delaney's counsel re acceptance of service.	
06/18/20	MAXWELL SANDGRUND	2.30
	Draft and review of email correspondence [REDACTED] [REDACTED] regarding motion to dismiss; telephone conference with [REDACTED] regarding motion to dismiss; review of defendant's opposition to motion to dismiss; review of motion to dismiss; review of complaint.	
06/18/20	SAMUEL RATTIGAN	3.70
	Work organizing and indexing materials for ARJM in preparation for drafting Reply to Motion to Dismiss; monitor/review the Court's docket in order to confirm case docket file to be up to date and all upcoming hearings and deadlines confirmed.	
06/19/20	ANDREW MUIR	.80
	Begin drafting arguments for reply in further support of motion to stay.	
06/20/20	ANDREW MUIR	4.60
	Analyze Delaney's counterclaims and begin to research case law for inclusion in reply in support of Motion to dismiss.	

HC2, Inc. d/b/a Hire Counsel  
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06/21/20	ANN M. ST. PETER-GRIFFITH Conference with A. Muir re: reply to opposition to Motion to Dismiss.	.50
06/21/20	ANDREW MUIR Review counterclaims and opposition, research case law in opposition brief and draft reply.	10.00
06/22/20	RONALD R. ROSSI Attention to reply brief re MTD.	1.30
06/22/20	ANDREW MUIR Research and draft reply in further support of motion to dismiss.	13.10
06/23/20	RONALD R. ROSSI Attention to review and revision of reply to MTD; numerous correspondence and t/c w AM re same.	8.80
06/23/20	PAUL BURGO Review audit letter and related corr. w/ R. Rossi, G. Schryver, B. Rutcofsky, and J. Recine re same.	.10
06/23/20	ANN M. ST. PETER-GRIFFITH Review and revise Reply memorandum to Opposition to Motion to Dismiss Counterclaim; [REDACTED] [REDACTED].	.50
06/23/20	ANDREW MUIR Revise draft reply in further support of motion to dismiss counterclaims based on review by R. Rossi.	4.60
06/23/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] [REDACTED] regarding reply brief; review of reply brief; conducted and reviewed legal research regarding abuse of process; conducted and reviewed legal research regarding defamation.	4.60
06/23/20	SAMUEL RATTIGAN T/C w/ ARJM re preparing draft letter to [REDACTED] and work drafting same; review/monitor the Court's docket to confirm case docket file to be current.	1.10

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
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Jul 31, 2020

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06/24/20	RONALD R. ROSSI Attention to review and revision of reply brief to MTD; supervise filing of same.	5.20
06/24/20	ANDREW MUIR Finalize reply brief and attention to filing same.	2.70
06/24/20	MAXWELL SANDGRUND Draft and review of email correspondence [REDACTED] [REDACTED] and [REDACTED] regarding reply brief; review of reply brief; conducted and reviewed legal research regarding abuse of process; conducted and reviewed legal research regarding defamation.	1.80
07/02/20	KIRSTEN C. JACKSON Review [REDACTED].	1.20
07/02/20	ANDREW MUIR Attention to [REDACTED] issues.	4.00
07/06/20	SAMUEL RATTIGAN Initial reviews of deposition notices for Hartstein, Davison, and Ayala and work saving same to case file.	.30
07/08/20	ANDREW MUIR Revise, finalize and transmit letter to R. Rotman re service.	.60
07/10/20	ANDREW MUIR Analyze response from opposing counsel; draft reply and coordinate with R. Rossi; correspond with opposing counsel re acceptance of service.	.60
07/10/20	MAXWELL SANDGRUND Review of email correspondence from A. Muir regarding case update; review of defendant document requests.	.40
07/13/20	KIRSTEN C. JACKSON Attention to [REDACTED] issues.	2.00
07/13/20	ANDREW MUIR Attention to [REDACTED] issues.	.30
07/13/20	SAMUEL RATTIGAN Work updating case file w/ Delaney's second discovery requests and recently filed Court Order.	.20

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
INVOICE NO.: 2005911

Jul 31, 2020

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07/14/20	ANDREW MUIR Attention to [REDACTED] issues.	.40
07/15/20	ANDREW MUIR Confirm delivery of document production to client and correspond with client re same.	.20
07/16/20	ANDREW MUIR Attention to [REDACTED] [REDACTED].	1.30
07/17/20	MARC E. KASOWITZ Review Judge Liman decision.	.20
07/17/20	RONALD R. ROSSI Attend conference re MTD decision, update trial team re same.	1.20
07/17/20	ANDREW MUIR Attend hearing re motion to dismiss.	.40
07/17/20	MAXWELL SANDGRUND Draft and review of email correspondence with R. Rossi regarding court conference; review of court docket.	.30
07/20/20	ANDREW MUIR Review [REDACTED], prior requests from [REDACTED], orders re filing under seal and protective order and draft reply to [REDACTED] for use by R. Rossi.	3.00
07/21/20	ANDREW MUIR Review and revise draft letters to opposing counsel re discovery; attention to researching, preparing and filing certificate of service re summons and complaint.	4.90
07/21/20	MAXWELL SANDGRUND Draft and review of email correspondence with A. Muir regarding service dates.	.30
07/21/20	SAMUEL RATTIGAN Work editing and preparing emails to be used as exhibits ISO declaration to dismiss counter-claims.	.40
07/22/20	ANDREW MUIR Revise correspondence re discovery deficiencies and correspond with R. Rossi re same.	1.60

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
INVOICE NO.: 2005911

Jul 31, 2020

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07/23/20	ANDREW MUIR	.70
	Finalize correspondence to opposing counsel re discovery and transmit same; draft update to and correspond with [REDACTED].	
07/23/20	SAMUEL RATTIGAN	.90
	Finalize outgoing correspondence from ARJM; work researching requirements and costs and ordering transcript of hearing re motion to dismiss counterclaims.	
07/24/20	KIRSTEN C. JACKSON	.50
	Strategy re: [REDACTED].	
07/29/20	SAMUEL RATTIGAN	.20
	Review/monitor the Court's docket to confirm case file to be current.	
07/30/20	ANDREW MUIR	.20
	Attention to upcoming deadlines re settlement conference.	
07/30/20	SAMUEL RATTIGAN	.30
	Review/monitor the Court's docket and work updating case docket file.	

TOTAL HOURS	229.50
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HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
INVOICE NO.: 2005911

Jul 31, 2020 PAGE 11

	HOURS	RATE	AMOUNT
PARTNER			
PAUL BURGO	.10	1,075.00	107.50
KIRSTEN C. JACKSON	6.40	600.00	3,840.00
MARC E. KASOWITZ	1.20	1,950.00	2,340.00
RONALD R. ROSSI	41.20	1,150.00	47,380.00
ANN M. ST. PETER-GRIFFITH	15.70	705.00	11,068.50
ASSOCIATE			
MATTHEW LAWRENCE	5.50	475.00	2,612.50
KALITAMARA L. MOODY	10.90	825.00	8,992.50
ANDREW MUIR	92.40	475.00	43,890.00
MAXWELL SANDGRUND	47.40	675.00	31,995.00
PARALEGAL			
SAMUEL RATTIGAN	8.70	195.00	1,696.50
TOTAL FEES			\$153,922.50
OFFICIAL RECORDS SEARCH			76.90
PROFESSIONAL SERVICES			443.53
AUTOMATED RESEARCH			1,990.91
DOCUMENT REPRODUCTION			153.18
DOCUMENT DELIVERY			21.79
TOTAL COSTS			\$2,686.31
TOTAL FEES AND COSTS			\$156,608.81

KASOWITZ BENSON TORRES LLP

MARC E. KASOWITZ  
DIRECT DIAL: 212-506-1710  
DIRECT FAX: 212-835-5010  
[MKASOWITZ@KASOWITZ.COM](mailto:MKASOWITZ@KASOWITZ.COM)

1633 BROADWAY  
NEW YORK, NEW YORK 10019  
(212) 506-1700  
FAX: (212) 506-1800

ATLANTA  
HOUSTON  
LOS ANGELES  
MIAMI  
NEWARK  
SAN FRANCISCO  
SILICON VALLEY  
WASHINGTON DC

October 15, 2020

Joan Davison  
HC2, Inc. d/b/a Hire Counsel  
225 West Washington Street  
Chicago, IL 60606

Re: Hire Counsel v. Delaney

Dear Joan:

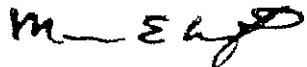
I hope you and your family are safe and well.

I enclose our invoice for professional services rendered and disbursements incurred through August 2020. Also enclosed is a detailed summary of services.

Please let me know if you have any questions.

Best.

Sincerely,



Marc E. Kasowitz

Enclosures

**KASOWITZ BENSON TORRES LLP**

1633 BROADWAY  
NEW YORK, NEW YORK 10019-6799  
212-506-1700  
FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2006506

October 15, 2020

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of August 2020  
as reflected on the attached printout.

Fees	\$1,674.50
Less 10% Discount	(167.45)
Total Fees	\$1,507.05
Disbursements	332.91
Current Amount Due	\$1,839.96
Previous Balance	576,675.65
<b>TOTAL AMOUNT DUE</b>	<b>\$578,515.61</b>

5401  
12302201

KASOWITZ BENSON TORRES LLP  
1633 BROADWAY  
NEW YORK, NY 10019-6799

Federal I.D. # 13-3720397

AUGUST 31, 2020

12302201  
HC2, Inc. d/b/a Hire Counsel  
Hire Counsel v. Delaney

DATE	ATTORNEY OR ASSISTANT	HOURS
07/17/20	DANIEL R. BENSON	.50
	Work re [REDACTED] re J. Liman decision.	
08/03/20	SAMUEL RATTIGAN	.10
	Confer w/ ARJM re status of hearing transcript on motion to dismiss counterclaims.	
08/04/20	SAMUEL RATTIGAN	.30
	Email w/ SD Reporters re the status of transcript from hearing on Motion to Dismiss Counter-Claims and work updating case file re same.	
08/07/20	SAMUEL RATTIGAN	.20
	Update case file w/ recently filed notice of counsel and review/monitor the Court's Docket to confirm file to be complete.	
08/10/20	SAMUEL RATTIGAN	.10
	Update case discovery folder w/ HC2's responses to Delaney's second discovery requests.	
08/11/20	SAMUEL RATTIGAN	.20
	Update case file w/ recently file Notice of Filing of Transcript and confer w/ ARJM re the Court's error in same.	
08/12/20	SAMUEL RATTIGAN	.70
	Update case Docket file w/ recently filed letter motions and responses to same and work re general file maintenance.	
08/13/20	SAMUEL RATTIGAN	.20
	Work w/ B. Guignard and J. Hernandez re payment of invoice for hearing transcripts.	

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
INVOICE NO.: 2006506

Aug 31, 2020 PAGE 2

08/14/20	SAMUEL RATTIGAN	.10
	Review/monitor the Court's docket to identify any new filings not in the case Docket folder.	
08/17/20	SAMUEL RATTIGAN	.40
	Work reviewing case file to confirm all recent filings and communications are in same.	
08/18/20	SAMUEL RATTIGAN	.30
	Review/monitor the Court's Docket ot confirm case Docket folder to be complete.	
08/20/20	SAMUEL RATTIGAN	.30
	Monitor/review the Court's Docket to identify any new filings not in the case file and confirm all hearings to be calendared.	
08/25/20	SAMUEL RATTIGAN	.90
	Review/monitor the Court's docket and multiple emails from MAO fwd recent filings and work updating case docket file w/ multiple same.	
08/26/20	SAMUEL RATTIGAN	.30
	Review/monitor the Court's Docket to confirm case Docket folder to be complete.	
	TOTAL HOURS	4.60

HC2, Inc. d/b/a Hire Counsel  
FILE NUMBER: 12302201  
INVOICE NO.: 2006506

Aug 31, 2020 PAGE 3

	HOURS	RATE	AMOUNT
PARTNER			
DANIEL R. BENSON	.50	1,750.00	875.00
PARALEGAL			
SAMUEL RATTIGAN	4.10	195.00	799.50
TOTAL FEES			\$1,674.50
OFFICIAL RECORDS SEARCH			7.30
AUTOMATED RESEARCH			325.61
TOTAL COSTS			\$332.91
TOTAL FEES AND COSTS			\$2,007.41



Submit Via E-Mail Only –  
Do Not Send Hard Copy

July 27, 2020

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law

Administrative Office  
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Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1900  
Facsimile: (864) 241-1908  
[www.ogletreedeakins.com](http://www.ogletreedeakins.com)

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

PERSONAL AND CONFIDENTIAL

Bill # 90238562  
Client.Matter # 029879.000036

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through June 30, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$7,059.15
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$7,059.15</b>

<u>Wire Payments</u> [REDACTED]	<u>ACH Payments</u> [REDACTED]	<u>Check Payments</u> PO Box 89 Columbia, SC 29202
------------------------------------	-----------------------------------	--

Credit to Ogletree Deakins Nash Smoak & Stewart / Please Include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



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07/27/20  
Bill No. 90238562  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through June 30, 2020

Date	Initials	Description	Hours	Amount
06/05/20	VLW	Analyze and review pleadings.	1.70	589.05
06/09/20	MN	Review publications relating to Andrew Delaney.	0.30	120.15
06/09/20	MN	Correspondence with [REDACTED]	0.10	40.05
06/10/20	MN	Begin review of background information on claims [REDACTED]	1.50	600.75
06/11/20	MN	Continue review of voluminous documents received from client; research on Andrew Delaney.	4.60	1,842.30
06/11/20	AA	Download and send all available documents from 1:20 cv 3178.	0.90	186.30
06/12/20	MN	Phone call with [REDACTED]	0.40	160.20
06/12/20	MN	Begin review of deposition transcript of [REDACTED]	2.50	1,001.25
06/15/20	MN	Continue review of [REDACTED] deposition.	0.80	320.40
06/18/20	MN	Confer with Valerie Weiss regarding case status.	0.30	120.15
06/18/20	MN	Continue review of company documents and deposition transcript of [REDACTED]	1.30	520.65
06/22/20	VLW	Analyze and review case documents, including performance documents.	2.30	796.95
06/23/20	MN	Continue review of voluminous company documents.	1.20	480.60
06/24/20	MN	Continue review of [REDACTED] deposition.	0.70	280.35
Total Services:			18.60	7,059.15

#### Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Valerie L. Weiss	Associate	346.50	4.00	1,386.00
Michael Nacchio	Of Counsel	400.50	13.70	5,486.85
Andrea Alexander	Other	207.00	0.90	186.30

Ogletree  
Deakins

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07/27/20  
Bill No. 90238562  
029879.000036-CRP

TOTAL FEES	\$7,059.15
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$7,059.15



Submit Via E-Mail Only –  
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August 11, 2020

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law

Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1900  
Facsimile: (864) 241-1908  
[www.ogletreedeakins.com](http://www.ogletreedeakins.com)

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
Szannikos@hirecounsel.com

PERSONAL AND CONFIDENTIAL

Bill # 90256490  
Client.Matter # 029879.000036

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through July 31, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$19,926.00
Expenses.....	\$1,115.00
<b>Total Due This Bill.....</b>	<b>\$21,041.00</b>

<b>Wire Payments</b> [REDACTED]	<b>ACH Payments</b> [REDACTED]	<b>Check Payments</b> PO Box 89 Columbia, SC 29202
------------------------------------	-----------------------------------	--

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)

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08/11/20  
Bill No. 90256490  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
Szannikos@hirecounsel.com

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

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For professional services rendered through July 31, 2020

Date	Initials	Description	Hours	Amount
07/07/20	MN	Review and respond to email from [REDACTED] about upcoming motion date.	0.20	80.10
07/13/20	MN	Strategy call with [REDACTED]	0.80	320.40
07/13/20	MN	Continue further review of company documents and motions received from [REDACTED]	2.20	881.10
07/14/20	MN	Continue review of case documents, including complaint and counterclaim; timeline documents; motion to dismiss counterclaim; spreadsheets created by [REDACTED] and related documentation for fact investigation/development; review of Delaney's written discovery responses and document productions.	4.70	1,882.35
07/14/20	MN	Communications with [REDACTED] call to [REDACTED]	0.20	80.10
07/14/20	MN	Confer with [REDACTED] about [REDACTED] case.	0.30	120.15
07/15/20	MN	Call with [REDACTED] including preparations.	1.10	440.55
07/15/20	MN	Continue review of voluminous documents and case filings.	2.80	1,121.40
07/15/20	MN	Communications with [REDACTED] by email and telephone.	0.30	120.15
07/15/20	MN	Conference call with [REDACTED]	0.90	360.45
07/15/20	MN	Review transcripts of [REDACTED]	1.30	520.65
07/15/20	MN	Call with [REDACTED] about [REDACTED]	0.60	240.30
07/16/20	MN	Continue review of [REDACTED] created by [REDACTED] relating to [REDACTED]	1.40	560.70
07/16/20	MN	Communications with [REDACTED] and with [REDACTED]	0.40	160.20

# Ogletree Deakins

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08/11/20  
Bill No. 90256490  
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Date	Initials	Description	Hours	Amount
		[REDACTED] regarding case documents.		
07/16/20	MN	Analysis of [REDACTED] in regards to Delaney litigation.	0.50	200.25
07/16/20	MN	Continue review of [REDACTED] and [REDACTED] including [REDACTED] [REDACTED]	5.70	2,282.85
07/16/20	VLW	Begin drafting responses to second set of interrogatories.	4.80	1,663.20
07/17/20	MN	Analysis of Delaney's written discovery responses.	0.80	320.40
07/17/20	MN	Confer with [REDACTED] about c [REDACTED] [REDACTED] in light of dismissal of counterclaim.	0.20	80.10
07/17/20	MN	Call with [REDACTED] about [REDACTED]	0.20	80.10
07/17/20	MN	Analysis of case strategy [REDACTED] [REDACTED]	0.40	160.20
07/20/20	MN	Strategy call with [REDACTED] about [REDACTED]	0.40	160.20
07/20/20	MN	Confer with Valerie Weiss [REDACTED]	0.20	80.10
07/20/20	MN	Continue analysis of plaintiff's written discovery deficiencies.	0.50	200.25
07/20/20	MN	Draft notice of deposition of Defendant.	0.40	160.20
07/20/20	MN	Draft deficiency letter to Defendant regarding written discovery responses and prepare deficiency letter to plaintiff; related letter pertaining to Delaney's deposition notices to HC2.	3.50	1,401.75
07/21/20	MN	Email communications with [REDACTED]	0.40	160.20
07/21/20	MN	Review and revise deficiency letter, letter canceling depositions, and notice of deposition.	0.90	360.45
07/21/20	MN	Phone call with [REDACTED]	0.50	200.25
07/21/20	MN	Email and phone case status communications with [REDACTED]	0.70	280.35
07/22/20	MN	Draft outreach email to Delaney's counsel [REDACTED]	0.30	120.15
07/22/20	MN	Continue analysis of [REDACTED] and [REDACTED] review of [REDACTED]	3.60	1,441.80



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08/11/20  
Bill No. 90256490  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		[REDACTED] includes direction to research support assistant.		
07/22/20	MN	Download and organize voluminous document productions from [REDACTED]	0.50	200.25
07/22/20	MN	Begin analysis of Delaney document production; thai language documentation requiring translation.	0.70	280.35
07/23/20	MN	Communications with [REDACTED] about [REDACTED]	0.30	120.15
07/23/20	MN	Continue analysis of the parties first written discovery responses and objections.	0.80	320.40
07/23/20	MN	Cause and analyze voluminous file intake of Rotman declaration exhibits [REDACTED]	0.30	120.15
07/24/20	MN	Review and analyze Delaney's document production.	1.40	560.70
07/24/20	MN	Communications (email and telephone) with Transperfect Legal Solutions [REDACTED]	0.20	80.10
07/24/20	MN	Review [REDACTED]	0.20	80.10
07/24/20	MN	Call with [REDACTED] about [REDACTED]	0.20	80.10
07/27/20	MN	Prepare follow up email to Delaney's counsel.	0.20	80.10
07/29/20	MN	Email correspondence with Delaney's counsel about settlement overture and related planning.	0.20	80.10
07/29/20	MN	Confer with [REDACTED] about [REDACTED].	0.20	80.10
07/29/20	MN	Review pertinent documents from [REDACTED] and prep for call with Delaney's counsel.	1.20	480.60
07/29/20	MN	Preliminary overview of [REDACTED] articles produced by Delaney.	0.30	120.15
07/30/20	MN	Phone call with Delaney's counsel, Robert Rotman.	0.40	160.20
07/30/20	MN	Continue review of [REDACTED].	0.50	200.25
07/30/20	MN	Phone call with [REDACTED] about outcome of call with Delaney's counsel.	0.50	200.25
07/30/20	MN	Phone call with [REDACTED] call to [REDACTED]	0.40	160.20
07/31/20	MN	Confer with Valerie Weiss about written discovery responses due August 10th and prospective amended complaint.	0.30	120.15
07/31/20	MN	Follow up phone call with Delaney's counsel about settlement overture; email to [REDACTED]	0.40	160.20

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Deakins

Page 5  
08/11/20  
Bill No. 90256490  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		about same.		
		Total Services:	50.40	19,926.00

**Timekeeper Summary**

Timekeeper	Title	Rate	Hours	Amount
Valerie L. Weiss	Associate	346.50	4.80	1,663.20
Michael Nacchio	Of Counsel	400.50	45.60	18,262.80

**Expenses**

Description	Amount
VENDOR: TransPerfect [REDACTED] International, INVOICE#: 1914482 DATE: 7/31/2020	1,115.00
Professional Fees - TransPerfect [REDACTED] International, - [REDACTED] [REDACTED] Document - on 07/31/20	
Total Expenses	1,115.00

TOTAL FEES	\$19,926.00
TOTAL EXPENSES	\$1,115.00
TOTAL THIS BILL	\$21,041.00



Submit Via E-Mail Only –  
Do Not Send Hard Copy

September 11, 2020

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law

Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1801  
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Stephanos Zannikos  
Hire Counsel Legal and Review Management  
[SZannikos@hirecounsel.com](mailto:SZannikos@hirecounsel.com)

PERSONAL AND CONFIDENTIAL

Bill # 90273991  
Client.Matter # 029879.000036

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through August 31, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$37,188.45
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$37,188.45</b>

<u>Wire Payments</u>	<u>ACH Payments</u>	<u>Check Payments</u>
[REDACTED]	[REDACTED]	PO Box 89 Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)

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Deakins

Page 2  
09/11/20  
Bill No. 90273991  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

---

For professional services rendered through August 31, 2020

Date	Initials	Description	Hours	Amount
08/03/20	MN	Call with [REDACTED] regarding [REDACTED]	0.20	80.10
08/03/20	MN	Continue review of Delaney's document production; [REDACTED]	1.30	520.65
08/03/20	MN	Begin analysis of Plaintiff's amended counterclaims.	0.80	320.40
08/03/20	VLW	Draft Plaintiff's interrogatory responses to Defendant.	2.90	1,004.85
08/04/20	MN	Draft mediation statement for August 12th settlement conference, including revisions thereto.	8.80	3,524.40
08/04/20	MN	Initial review of document responses prepared by Valerie Weiss and attendant issues for follow up.	0.50	200.25
08/04/20	VLW	Continue drafting Plaintiff's responses to Defendant's second set of document requests.	3.50	1,212.75
08/04/20	VLW	Continue drafting Plaintiff's responses to Defendant's set of interrogatories.	3.70	1,282.05
08/05/20	MN	Continue review and revisions of responses to Defendant's second request for documents prepared by Valerie Weiss.	1.40	560.70
08/05/20	MN	Confer with Valerie Weiss about [REDACTED] discovery [REDACTED].	0.80	320.40
08/05/20	MN	Review and revisions of responses to Defendant's second interrogatories prepared by Valerie Weiss.	1.70	680.85
08/05/20	VLW	Continue drafting interrogatory responses.	3.20	1,108.80
08/05/20	VLW	Draft substitution of counsel.	0.20	69.30
08/05/20	VLW	Begin drafting responses to requests for admissions.	1.10	381.15
08/06/20	MN	Phone call with [REDACTED] about [REDACTED]	0.20	80.10
08/06/20	MN	Analysis of the Amended Counterclaim.	1.00	400.50

# Ogletree Deakins

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09/11/20  
Bill No. 90273991  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
08/07/20	MN	Finalize settlement statement and send same to [REDACTED]	0.40	160.20
08/07/20	MN	Further review and revisions to settlement statement after [REDACTED] submission of same to Magistrate Judge Fox.	1.60	640.80
08/07/20	MN	Review and revise objections and responses to Delaney's Second Requests for Admissions, Second Interrogatories, and Second Request for Production of Documents.	3.60	1,441.80
08/07/20	MN	Draft and file notice of appearance.	0.40	160.20
08/07/20	VLW	Continue drafting responses to Defendant's requests for admission.	1.50	519.75
08/07/20	VLW	Revise discovery responses based on comments from [REDACTED]	0.40	138.60
08/08/20	MN	Review email from [REDACTED] confer with [REDACTED]	0.10	40.05
08/10/20	MN	Further review and revisions to voluminous responses to second requests for admission, second document demands, and second interrogatories from Delaney; includes related correspondence about same with [REDACTED] and Valerie Weiss.	3.60	1,441.80
08/10/20	MN	Analysis of amended counterclaims and related case law authority.	1.70	680.85
08/10/20	MN	Begin drafting motion to dismiss amended counterclaims.	2.30	921.15
08/10/20	MN	Review Court's July 17, 2020 decision granting motion to dismiss counterclaims.	0.30	120.15
08/10/20	VLW	Revise responses to Defendant's discovery requests.	1.60	554.40
08/11/20	MN	Continue drafting brief in support of motion to dismiss counterclaims.	9.20	3,684.60
08/11/20	MN	Prepare for tomorrow's settlement conference.	0.40	160.20
08/11/20	MN	Draft and file extension request to respond to amended counterclaim; review Delaney's letter response.	0.40	160.20
08/11/20	AA	Searches in Westlaw, Bloomberg, and miscellaneous sources for information addressing [REDACTED]	2.10	434.70
		[REDACTED] Summarizing results and sending to requesting attorney along with cases.		
08/12/20	MN	Preparation call with [REDACTED]	0.30	120.15
08/12/20	MN	Confer with Valerie Weiss about motion to dismiss	0.20	80.10

**Ogletree  
Deakins**

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09/11/20  
Bill No. 90273991  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		arguments.		
08/12/20	MN	Email communications with [REDACTED] relating to motion to dismiss amended counterclaims.	0.10	40.05
08/12/20	MN	Review voicemail from court and respond; pre conference telephone call with chambers regarding settlement statement and Delaney's failure to submit.	0.10	40.05
08/12/20	MN	Represent client at settlement teleconference.	0.50	200.25
08/12/20	MN	Continue drafting brief in support of motion to dismiss amended counterclaims.	9.40	3,764.70
08/12/20	VLW	Begin researching New York state and federal case law to oppose counterclaim regarding abuse of process.	2.30	796.95
08/13/20	MN	Continue drafting brief in support of motion to dismiss.	4.60	1,842.30
08/13/20	VLW	Continue researching New York state and federal case law to oppose counterclaim regarding abuse of process.	1.00	346.50
08/13/20	VLW	Draft abuse of process legal argument section of brief in support of motion to dismiss.	2.20	762.30
08/13/20	VLW	Revise brief in support of motion to dismiss amended counterclaims.	1.10	381.15
08/14/20	MN	Revisions to opening brief to motion to dismiss.	1.20	480.60
08/14/20	MN	Communications with [REDACTED] about [REDACTED] about motion to dismiss.	0.30	120.15
08/15/20	MN	Continue revision and proofing of brief in support of motion to dismiss counterclaims.	0.90	360.45
08/17/20	MN	Continue review and revisions to motion to dismiss opening brief based particularly on [REDACTED] comments.	4.20	1,682.10
08/17/20	MN	Send [REDACTED] deposition notice to [REDACTED] planning relating to same.	0.20	80.10
08/20/20	MN	Email to Plaintiff's counsel relating to deposition adjournments.	0.10	40.05
08/21/20	MN	Review email with deposition notices attached from Delaney's counsel, plan for deadlines, and email about same to [REDACTED]	0.40	160.20
08/24/20	MN	Email correspondence with Delaney's counsel regarding depositions and review of "reasonable notice" standards under Rule 30.	0.50	200.25
08/24/20	MN	Analyze Delaney's response to email adjourning deposition, including drafting and filing letter	2.10	841.05

**Ogletree  
Deakins**

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09/11/20  
Bill No. 90273991  
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Date	Initials	Description	Hours	Amount
		application to the Court for a conference, and attendant efforts that include phone call conferral with Plaintiff's counsel, review of [REDACTED]		
08/24/20	MN	Finalize substitution of counsel and email same to [REDACTED]	0.30	120.15
08/24/20	MN	Confer with [REDACTED] by email about deposition scheduling issues.	0.30	120.15
08/25/20	MN	Review plaintiff's letter response to the Court for a conference.	0.50	200.25
08/25/20	MN	Further Communications with [REDACTED] at [REDACTED] about Delaney depositions; review [REDACTED]	0.50	200.25
08/25/20	MN	Prepare response letter to opposition to letter-motion for conference; communications about same with [REDACTED]	0.60	240.30
08/25/20	MN	Finalize and file substitution of counsel.	0.30	120.15
08/25/20	MN	Draft second notice of deposition to Defendant; send same.	0.30	120.15
08/27/20	MN	Review ECF notification granting Court Order, advise [REDACTED] of same, and calendar and plan for conference.	0.10	40.05
08/28/20	MN	Review filings, discovery responses, and prepare for telephone conference.	0.70	280.35
08/28/20	MN	Appear for HC2 at court mandated status conference.	0.40	160.20
08/28/20	MN	Phone call with [REDACTED] and correspondence to [REDACTED] relating to outcome of discovery conference; related follow up correspondence with [REDACTED] about conferral before September 9 Plaintiff's deposition.	0.40	160.20
08/31/20	MN	Review docket sheet and preparations to order minutes of 8/27 hearing as directed by Judge Liman.	0.20	80.10
Total Services:			97.20	37,188.45

#### Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Valerie L. Weiss	Associate	346.50	24.70	8,558.55
Michael Nacchio	Of Counsel	400.50	70.40	28,195.20
Andrea Alexander	Other	207.00	2.10	434.70

Ogletree  
Deakins

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09/11/20  
Bill No. 90273991  
029879.000036-CRP

TOTAL FEES	\$37,188.45
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$37,188.45



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OGLETREE, DEAKINS, NASH,  
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October 18, 2020

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
[SZannikos@hirecounsel.com](mailto:SZannikos@hirecounsel.com)

PERSONAL AND CONFIDENTIAL

Bill # 90294311  
Client.Matter # 029879.000036

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

For professional services rendered through September 30, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$17,858.25
Expenses.....	\$1,995.74
<b>Total Due This Bill.....</b>	<b>\$19,853.99</b>

Wire Payments [REDACTED] ACH Payments [REDACTED] Check Payments  
[REDACTED]  
PO Box 89  
Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



Page 2  
10/18/20  
Bill No. 90294311  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

Re: **Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

---

For professional services rendered through September 30, 2020

Date	Initials	Description	Hours	Amount
09/01/20	MN	Send Delaney's opposition filing to [REDACTED] related communications.	0.40	160.20
09/01/20	MN	Review inquiry from [REDACTED] and multiple ensuing communications about same with [REDACTED]	0.80	320.40
09/01/20	MN	Analysis of Plaintiff's opposition filing.	0.50	200.25
09/01/20	MN	Return phone call to [REDACTED] in regards to [REDACTED]	0.10	40.05
09/01/20	MN	Strategy call with [REDACTED]	0.70	280.35
09/01/20	MN	Phone call with [REDACTED] about [REDACTED]	0.20	80.10
09/01/20	MN	Review transcript of [REDACTED]	0.30	120.15
09/02/20	MN	Analysis of plaintiff's opposition brief.	0.70	280.35
09/02/20	MN	Begin drafting reply brief to motion to dismiss.	4.70	1,882.35
09/03/20	MN	Continue drafting reply brief in support of motion to dismiss amended counterclaims.	8.80	3,524.40
09/03/20	VLW	Begin drafting reply brief argument regarding abuse of process counterclaim.	1.30	450.45
09/04/20	MN	Revisions to reply brief in support of motion to dismiss, finalize document and send same to [REDACTED]	4.20	1,682.10
09/04/20	VLW	Continue drafting reply brief argument regarding abuse of process counterclaim.	1.00	346.50
09/08/20	MN	Phone calls with [REDACTED]	0.80	320.40
09/08/20	MN	Prepare for tomorrow deposition of Plaintiff.	3.50	1,401.75
09/08/20	MN	Review revisions of [REDACTED] reply brief; incorporate same and [REDACTED]	2.10	841.05



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10/18/20  
Bill No. 90294311  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		finalize brief; file same with the Court.		
09/09/20	MN	Continue final preparations for Plaintiff's deposition.	3.00	1,201.50
09/09/20	MN	Appear for HC2 and conduct deposition of Defendant Andrew Delaney.	6.70	2,683.35
09/10/20	MN	Confer with [REDACTED] about plaintiff's deposition.	0.70	280.35
09/10/20	MN	Begin analysis and preparation of post-deposition written discovery.	1.80	720.90
09/10/20	MN	Phone call with [REDACTED] about [REDACTED]	0.70	280.35
09/14/20	MN	Review rough version of Delaney deposition.	0.30	120.15
09/21/20	MN	Review draft deposition of plaintiff.	0.30	120.15
09/23/20	MN	Review protective order regarding designation of deposition testimony as confidential.	0.20	80.10
09/28/20	MN	Review generally plaintiff's deposition, send same to [REDACTED] and review and respond to Plaintiff's request for transcript, including analysis of [REDACTED]	0.70	280.35
09/28/20	MN	Confer with Valerie Weiss about [REDACTED]	0.40	160.20
		Total Services:	44.90	17,858.25

#### Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Valerie L. Weiss	Associate	346.50	2.30	796.95
Michael Nacchio	Of Counsel	400.50	42.60	17,061.30

#### Expenses

Description	Amount
VENDOR: U. S. Bank INVOICE#: 4275076409151408 DATE: 9/15/2020 Jill E. Glassman - Deposition/Transcript - Deposition/Court Transcription. Michael Nachhio #: 4761 deponent: (N-A) vendor: (N-A) on 09/02/20	103.74
VENDOR: Diana L. R. Senatore, CSR INVOICE#: 20033 DATE: 9/23/2020 Depositions/Transcripts - Diana L. R. Senatore, CSR - Deposition of Andrew Delaney. - on 09/09/20 - Andrew Delaney	1,892.00
Total Expenses	1,995.74

TOTAL FEES \$17,858.25  
TOTAL EXPENSES \$1,995.74  
TOTAL THIS BILL \$19,853.99



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**OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.**

Attorneys at Law

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Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

November 13, 2020

Stephanos Zannikos

Hire Counsel Legal and Review Management

SZannikos@hirecounsel.com

PERSONAL AND CONFIDENTIAL

Bill # 90312290  
Client.Matter # 029879.000036

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

For professional services rendered through October 31, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$4,886.10
Expenses.....	\$0.00
<b>Total Due This Bill .....</b>	<b>\$4,886.10</b>

Wire Payments [REDACTED] ACH Payments [REDACTED] Check Payments  
PO Box 89  
Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



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11/13/20  
Bill No. 90312290  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
Szannikos@hirecounsel.com

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

---

For professional services rendered through October 31, 2020

Date	Initials	Description	Hours	Amount
10/02/20	MN	Planning for next steps and discovery obligations; review case management plan.	0.20	80.10
10/05/20	MN	Review protective order and draft letter to Defendant to designate as confidential Defendant's deposition transcript.	0.30	120.15
10/05/20	MN	Review defendant's deposition transcript.	1.60	640.80
10/05/20	MN	Draft affirmative post deposition request for admission to defendant.	0.30	120.15
10/05/20	MN	Draft affirmative post deposition requests for production.	0.40	160.20
10/06/20	MN	Continue review of Delaney's deposition transcript.	0.50	200.25
10/07/20	MN	Review docket sheet and facilitate ordering of TRO transcript [REDACTED].	0.20	80.10
10/07/20	MN	Finalize and service post-deposition written discovery to plaintiff; letter designation Delaney transcript as confidential.	1.00	400.50
10/27/20	MN	Analysis of discovery deadlines and planning for next steps.	0.20	80.10
10/27/20	MN	Begin analysis and [REDACTED] [REDACTED].	1.00	400.50
10/28/20	MN	Review plaintiff's deposition errata sheet.	0.30	120.15
10/29/20	MN	Continue analysis and digest of [REDACTED] [REDACTED].	5.60	2,242.80
10/30/20	MN	Analysis relating to deposition exhibits from Plaintiff's deposition.	0.30	120.15
10/30/20	MN	Analysis of scope of HC2 disclosures [REDACTED] [REDACTED]	0.30	120.15
Total Services:			12.20	4,886.10



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11/13/20  
Bill No. 90312290  
029879.000036-CRP

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Michael Nacchio	Of Counsel	400.50	12.20	4,886.10
		TOTAL FEES		\$4,886.10
		TOTAL EXPENSES		\$0.00
		TOTAL THIS BILL		\$4,886.10



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OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

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December 31, 2020

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
[SZannikos@hirecounsel.com](mailto:SZannikos@hirecounsel.com)

PERSONAL AND CONFIDENTIAL

Bill # 90333231  
Client.Matter # 029879.000036

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

For professional services rendered through November 30, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$4,005.00
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$4,005.00</b>

Wire Payments	ACH Payments	Check Payments
[REDACTED]	[REDACTED]	PO Box 89 Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
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12/31/20  
Bill No. 90333231  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

---

For professional services rendered through November 30, 2020

Date	Initials	Description	Hours	Amount
11/06/20	MN	Review case status.	0.20	80.10
11/06/20	MN	Correspondence with [REDACTED]	0.10	40.05
11/10/20	MN	Strategy call with [REDACTED]	0.40	160.20
11/10/20	MN	Communications with [REDACTED]	0.10	40.05
11/10/20	MN	Analysis relating to litigation strategy for remainder of case, including review discovery deadlines, review of plaintiff's deposition testimony [REDACTED] [REDACTED]	1.00	400.50
11/10/20	MN	Draft letter to Plaintiff's counsel relating to outstanding responses to post-deposition discovery demands.	0.50	200.25
11/10/20	MN	Analysis of case law on [REDACTED]	1.50	600.75
11/11/20	MN	Continue analysis of [REDACTED] case law in regards to [REDACTED]	1.50	600.75
11/11/20	MN	Prepare detailed email to [REDACTED] enclosing analysis explaining [REDACTED] [REDACTED]	1.00	400.50
11/11/20	MN	Email correspondence with [REDACTED] about strategy going forward.	0.30	120.15
11/11/20	MN	Phone call with [REDACTED] about strategy going forward.	0.20	80.10
11/19/20	MN	Phone call with [REDACTED] regarding next steps.	0.40	160.20
11/20/20	MN	Draft letter to the Court informing on the status of	0.80	320.40



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12/31/20  
Bill No. 90333231  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		discovery in advance of the November 30, 2020 discovery end date.		
11/20/20	MN	Communications with Plaintiff's counsel, [REDACTED] [REDACTED] about discovery letter report to Court.	0.50	200.25
11/23/20	MN	Finalize and file discovery dispute letter.	0.30	120.15
11/30/20	MN	Review and analyze Court order and draft letter to Court for clarification of same; related communications with [REDACTED] [REDACTED] about same.	1.20	480.60
		Total Services:	10.00	4,005.00

**Timekeeper Summary**

Timekeeper	Title	Rate	Hours	Amount
Michael Nacchio	Of Counsel	400.50	10.00	4,005.00
		TOTAL FEES		\$4,005.00
		TOTAL EXPENSES		\$0.00
		TOTAL THIS BILL		\$4,005.00



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February 15, 2021

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

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[www.ogletreedeakins.com](http://www.ogletreedeakins.com)

Stephanos Zannikos  
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PERSONAL AND CONFIDENTIAL

Bill # 90349870  
Client.Matter # 029879.000036

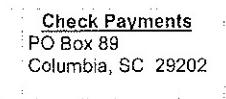
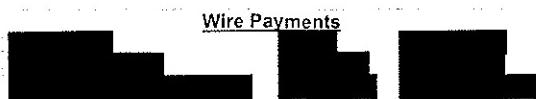
Re: **Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through December 31, 2020, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$5,995.80
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$5,995.80</b>



Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
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02/15/21  
Bill No. 90349870  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

**Re: Hire Counsel v. Andrew Delaney (USDC SDNY)**

**ALLIANZ Claim No. SF-USFF03539920**

**1:20-cv-03178-LJL**

For professional services rendered through December 31, 2020

Date	Initials	Description	Hours	Amount
12/01/20	MN	Further work toward obtaining pre-March 18th versions of NYC and CDC health guidance as directed by Court's November 30th Order, including communications with [REDACTED] and ultimate revisions to letter seeking clarification of November 30, 2020 Order and electronic filing of same.	1.00	400.50
12/01/20	MN	Review declaration filed by defendant's counsel annexing guidance and executive order as directed by the court.	0.20	80.10
12/02/20	MN	Analysis of [REDACTED] respond to email about same from [REDACTED]	0.70	280.35
12/02/20	MN	Draft letter to the Court regarding Defendant's submission of new information with his declaration; includes revisions.	1.80	720.90
12/02/20	MN	Analysis of Defendant's declaration, defendant's enclosed exhibits of agency guidance, and additional research into any new case law since filing of motion to dismiss regarding [REDACTED]	2.30	921.15
12/03/20	MN	Review Plaintiff's letter filed in response to our letter to strike new allegations from declaration.	0.10	40.05
12/03/20	MN	Analysis of [REDACTED]	0.30	120.15
12/08/20	MN	Calls with [REDACTED]	0.20	80.10
12/18/20	MN	Review and analyze Court's 32 page decision granting motion to dismiss counterclaims.	0.80	320.40



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02/15/21  
Bill No. 90349870  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
12/18/20	VLW	Analyze and review order and opinion granting HC2's Motion to Dismiss Defendant's counterclaims.	0.30	103.95
12/21/20	MN	Continue review and analysis of 32 page decision dismissing Delaney's counterclaims.	1.60	640.80
12/23/20	MN	Prepare for January 5, 2021 court appearance by [REDACTED] [REDACTED]	0.70	280.35
12/23/20	MN	Phone call with [REDACTED] [REDACTED]	0.20	80.10
12/28/20	MN	Review plaintiffs threatened Rule 11 motion, filed motion to dismiss for lack of jurisdiction, and send same to [REDACTED]	0.70	280.35
12/28/20	MN	Analysis of subject matter jurisdiction and [REDACTED] [REDACTED]	0.80	320.40
12/28/20	MN	Phone call with [REDACTED] relating to Delaney's motion to dismiss.	0.30	120.15
12/28/20	MN	Phone call [REDACTED]	0.40	160.20
12/28/20	MN	Review [REDACTED] [REDACTED]	0.30	120.15
12/28/20	VLW	Analyze and review Defendant's motion to dismiss based on lack of subject matter jurisdiction and [REDACTED] [REDACTED]	0.40	138.60
12/28/20	VLW	Analyze and review motion to dismiss based on diversity jurisdiction [REDACTED] [REDACTED]	0.80	277.20
12/28/20	VLW	Email [REDACTED] regarding Plaintiff's motion to dismiss.	0.20	69.30
12/29/20	MN	Further review of [REDACTED] [REDACTED] [REDACTED]	0.90	360.45
12/30/20	MN	Respond to [REDACTED] [REDACTED]	0.20	80.10
Total Services:			15.20	5,995.80



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02/15/21  
Bill No. 90349870  
029879.000036-CRP

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Valerie L. Weiss	Associate	346.50	1.70	589.05
Michael Nacchio	Of Counsel	400.50	13.50	5,406.75

TOTAL FEES	\$5,995.80
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$5,995.80



Submit Via E-Mail Only –  
Do Not Send Hard Copy

February 15, 2021

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law

Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
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Stephanos Zannikos  
Hire Counsel Legal and Review Management  
[SZannikos@hirecounsel.com](mailto:SZannikos@hirecounsel.com)

PERSONAL AND CONFIDENTIAL

Bill # 90368402  
Client.Matter # 029879.000036

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

For professional services rendered through January 31, 2021, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$38,976.30
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$38,976.30</b>

Wire Payments

[REDACTED]

ACH Payments

[REDACTED]

Check Payments

PO Box 89  
Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

Payable upon receipt. Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



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02/15/21  
Bill No. 90368402  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)

ALLIANZ Claim No. SF-USFF03539920

1:20-cv-03178-LJL

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For professional services rendered through January 31, 2021

Date	Initials	Description	Hours	Amount
01/04/21	MN	Analysis related to Delaney's motion to dismiss for lack of jurisdiction, including conferral with Valerie Weiss.	1.60	640.80
01/04/21	MN	Phone and email communications with [REDACTED] relating to [REDACTED]	0.80	320.40
01/04/21	MN	Review [REDACTED]	0.20	80.10
01/04/21	MN	Analysis of [REDACTED]	1.50	600.75
01/04/21	VLW	Analyze and review motion to dismiss based on subject matter jurisdiction to assess arguments for opposition motion.	0.70	242.55
01/04/21	VLW	Research Second Circuit law regarding whether [REDACTED]	2.10	727.65
01/05/21	MN	Appear for Plaintiff at court's status conference.	0.60	240.30
01/05/21	MN	Confer [REDACTED] with [REDACTED] and General Counsel about risks relating to Delaney's motion to dismiss and Rule 11 motion.	0.80	320.40
01/05/21	MN	Prepare for today's Court appearance later today by reviewing [REDACTED]	2.60	1,041.30

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02/15/21  
Bill No. 90368402  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/05/21	MN	Review Delaney's cited cases bearing on his motion to dismiss for lack of subject matter jurisdiction.	1.30	520.65
01/05/21	MN	Confer with [REDACTED] about [REDACTED] and motion to dismiss.	0.40	160.20
01/05/21	MN	Review docketed orders from the Court issued today.	0.20	80.10
01/05/21	VLW	Begin drafting statement of facts of opposition to motion to dismiss.	1.00	346.50
01/05/21	VLW	Research [REDACTED]	2.30	796.95
01/05/21	VLW	Begin drafting preliminary statement section of brief.	1.30	450.45
01/05/21	VLW	Research [REDACTED]	2.30	796.95
01/06/21	MN	Prepare and file extension request to oppose motion to dismiss; review order denying same and send same to [REDACTED]	0.40	160.20
01/06/21	MN	Continued analysis of [REDACTED]	0.90	360.45
01/06/21	MN	Participate in client call with [REDACTED]	0.50	200.25
01/06/21	MN	Review Delaney deposition transcript in regards to [REDACTED]	0.80	320.40
01/06/21	MN	Review and revise draft declaration for [REDACTED] in support of opposition to motion to dismiss prepared by Valerie Weiss.	1.20	480.60
01/06/21	MN	Call with [REDACTED] about [REDACTED]	0.30	120.15

Ogletree  
Deakins

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02/15/21  
Bill No. 90368402  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/06/21	MN	Review [REDACTED]	0.50	200.25
01/06/21	MN	Confer with Valerie Weiss about [REDACTED]	0.40	160.20
01/06/21	MN	Review [REDACTED]	0.20	80.10
01/06/21	VLW	Draft declaration of [REDACTED] in support of Plaintiff's opposition to Defendant's motion to dismiss for lack of subject matter jurisdiction.	2.20	762.30
01/06/21	VLW	Call with client [REDACTED] regarding [REDACTED]	0.50	173.25
01/06/21	VLW	Research 2nd Circuit case law regarding [REDACTED]	3.60	1,247.40
01/06/21	VLW	Begin drafting legal argument section of [REDACTED]	2.00	693.00
01/07/21	MN	Continue review and revision to [REDACTED] affidavit.	1.80	720.90
01/07/21	MN	Review Delaney's "exhibits" [REDACTED] in regards to [REDACTED]	0.30	120.15
01/07/21	MN	Analysis of case law relating to [REDACTED]	1.20	480.60
01/07/21	MN	Draft letter-motion to compel production of [REDACTED].	3.40	1,361.70
01/07/21	MN	Review [REDACTED] draft declaration prepared by Valerie Weiss.	0.40	160.20
01/07/21	MN	Continue analysis of [REDACTED]	1.50	600.75
01/07/21	VLW	Revised [REDACTED] declaration and email same to [REDACTED]	0.20	69.30
01/07/21	VLW	Draft legal argument section regarding [REDACTED]	2.10	727.65
01/07/21	VLW	Call with [REDACTED] regarding information about [REDACTED]	0.60	207.90



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02/15/21  
Bill No. 90368402  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/07/21	VLW	Begin researching [REDACTED]	0.70	242.55
01/08/21	MN	Revise and send letter to Delaney's counsel amending confidentiality designations.	0.20	80.10
01/08/21	MN	Review and revise [REDACTED]; research and add additional supporting case law.	1.20	480.60
01/08/21	MN	Correspondence with [REDACTED] and [REDACTED] about [REDACTED]	0.50	200.25
01/08/21	MN	Review and revisions to draft affidavits for [REDACTED] [REDACTED] in opposition to Plaintiff's motion to dismiss.	1.80	720.90
01/08/21	MN	Draft and file letter to Court seeking leave to preserve right to [REDACTED] is established.	0.30	120.15
01/08/21	VLW	Research Second Circuit case law regarding [REDACTED]	1.80	623.70
01/08/21	VLW	Call with [REDACTED] to discuss information for [REDACTED]	0.30	103.95
01/08/21	VLW	Call with [REDACTED] to discuss [REDACTED]	0.40	138.60
01/08/21	VLW	Draft declaration of [REDACTED] in support of Plaintiff's opposition to Defendant's Motion to Dismiss.	0.70	242.55
01/08/21	VLW	Draft declaration of [REDACTED] in support of Plaintiff's opposition to Defendant's Motion to Dismiss.	1.00	346.50
01/08/21	VLW	Revise declaration of [REDACTED] in support of Plaintiff's opposition to Defendant's Motion to Dismiss.	0.80	277.20
01/08/21	VLW	Revise declaration of [REDACTED]	0.40	138.60
01/08/21	VLW	Begin drafting legal argument section regarding compliance with local rule 26.1.	1.30	450.45
01/08/21	VLW	Continue drafting statement of facts section of the brief.	1.70	589.05
01/08/21	VLW	Analyze and review multiple emails from [REDACTED] [REDACTED] with information to include supporting declarations, such as [REDACTED]	0.90	311.85



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Bill No. 90368402  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/09/21	MN	Further review and revisions to latest drafts of affidavits for [REDACTED]	1.10	440.55
01/09/21	MN	Review and revise first and second rough drafts of opposition brief.	2.80	1,121.40
01/09/21	MN	Call with [REDACTED] about [REDACTED]	0.30	120.15
01/09/21	MN	Review [REDACTED]	0.20	80.10
01/09/21	VLW	Multiple revisions to declarations of [REDACTED] based on comments from [REDACTED]	2.30	796.95
01/09/21	VLW	Research Second Circuit case law [REDACTED]  [REDACTED]	1.70	589.05
01/09/21	VLW	Draft declaration of [REDACTED] in support of opposition to Plaintiff's motion.	0.50	173.25
01/09/21	VLW	Draft legal argument sections of brief regarding [REDACTED]	2.00	693.00
01/09/21	VLW	Draft legal argument section regarding [REDACTED]	0.30	103.95
01/09/21	VLW	Draft legal argument section regarding the [REDACTED]	2.00	693.00
01/09/21	VLW	Continue drafting legal argument regarding [REDACTED].	1.70	589.05
01/09/21	VLW	Begin revising brief based on comments from Michael Nacchio.	0.10	34.65
01/10/21	MN	Review continued revisions to latest drafts of HC2 [REDACTED] affidavits for opposition to Delaney's motion to dismiss, including review and responses to [REDACTED], Stephanos Zannikos, and client executive management team.	1.20	480.60
01/10/21	MN	Review and revisions to latest drafts of opposition brief to motion to dismiss.	1.60	640.80
01/10/21	VLW	Multiple revisions of legal brief in support of opposition to motion to dismiss, based on [REDACTED] client Stephanos Zannikos.	3.40	1,178.10
01/10/21	VLW	Multiple revisions for declaration of [REDACTED]	1.90	658.35



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Bill No. 90368402  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/10/21	VLW	Revise [REDACTED] declaration.	0.30	103.95
01/11/21	MN	Final review and revisions to opposition brief to motion to dismiss, affidavits, and supporting exhibits; includes related correspondence about same with [REDACTED] and Valerie Weiss.	4.80	1,922.40
01/11/21	MN	Review and analyze [REDACTED]  [REDACTED]	0.50	200.25
01/11/21	MN	Correspondence and phone calls [REDACTED] about opposition filing.	0.80	320.40
01/11/21	VLW	Research [REDACTED]	0.20	69.30
01/11/21	VLW	Draft declaration of Michael Nacchio, and multiple revisions [REDACTED]	2.70	935.55
01/11/21	VLW	Draft Local Civil Rule 26.1 statement.	0.40	138.60
01/11/21	VLW	Multiple revisions to brief [REDACTED]	2.90	1,004.85
01/11/21	VLW	Finalize brief and all declarations.	1.30	450.45
01/11/21	VLW	Gather and prepare exhibits to declaration of Michael Nacchio.	0.50	173.25
01/11/21	AA	Generate [REDACTED]	0.60	124.20
01/12/21	MN	Review [REDACTED]  [REDACTED]	0.80	320.40
01/12/21	MN	Review mediation order; confer with [REDACTED] about same.	0.10	40.05
01/13/21	MN	Review Delaney's Rule 11 threatened sanctions motion.	0.40	160.20
01/14/21	MN	Review notice of appeal and IFP petition filed by Andrew Delaney and analysis of next steps.	0.30	120.15
01/14/21	MN	Analysis of Delaney's obligations under [REDACTED]  [REDACTED]	0.30	120.15
01/14/21	MN	Confer with Valerie Weiss about [REDACTED]	0.20	80.10

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Deakins**

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029879.000036-CRP

Date	Initials	Description	Hours	Amount
01/14/21	MN	Analysis of Delaney's obligations under [REDACTED] [REDACTED] [REDACTED]	1.20	480.60
01/14/21	MN	Prepare email to [REDACTED] enclosing and explaining Delaney's [REDACTED] [REDACTED]	0.30	120.15
01/14/21	MN	Email correspondence with [REDACTED] [REDACTED] regarding [REDACTED] [REDACTED]	0.20	80.10
01/14/21	VLW	Analyze and review [REDACTED] [REDACTED]	0.30	103.95
01/14/21	VLW	Research [REDACTED] [REDACTED]	0.50	173.25
01/15/21	MN	Review Court of Appeals email notifications regarding Delaney's Notice of Appeal.	0.20	80.10
01/15/21	MN	General review of Delaney's court-ordered document production of [REDACTED] [REDACTED]	0.20	80.10
01/19/21	MN	Review Delaney's counsel's email regarding his threats and complaints of further "abuse of process".	0.20	80.10
01/19/21	MN	Review Delaney's reply brief in support of motion to dismiss complaint; send same to [REDACTED] [REDACTED]	0.60	240.30
01/19/21	MN	Review Delaney's filed Rule 11 sanctions motion; plan for opposition.	0.20	80.10
01/19/21	MN	Communications with [REDACTED] via email about Delaney's reply brief and his questions about [REDACTED] includes analysis [REDACTED] [REDACTED]	0.40	160.20
01/19/21	MN	Confer with Valerie Weiss about next steps in case.	0.20	80.10
01/19/21	VLW	Analyze and review [REDACTED] [REDACTED]	0.30	103.95
01/20/21	MN	Review and respond to email from [REDACTED] [REDACTED] with impressions about [REDACTED] [REDACTED]	0.20	80.10
01/22/21	MN	Review mediation orders and appointment of mediator; send email to [REDACTED] about same, and review mediator's profile.	0.20	80.10

Ogletree  
Deakins

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02/15/21  
Bill No. 90368402  
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Date	Initials	Description	Hours	Amount
01/25/21	MN	Communications with court assigned mediator.	0.10	40.05
01/25/21	MN	Review IFP statute, analyze [REDACTED] [REDACTED].	0.30	120.15
01/25/21	VLW	Review email from Delaney as pro se regarding application for in forma pauperis.	0.10	34.65
01/26/21	MN	Prepare for appearance with mediator (review court mediation order and procedures).	0.10	40.05
01/26/21	MN	Appear on pre-mediation conference call with mediator and Delaney's counsel; send follow up email to [REDACTED] [REDACTED]	0.50	200.25
Total Services:			105.20	38,976.30

**Timekeeper Summary**

Timekeeper	Title	Rate	Hours	Amount
Michael Nacchio	Shareholder	400.50	48.30	19,344.15
Valerie L. Weiss	Associate	346.50	56.30	19,507.95
Andrea Alexander	Other	207.00	0.60	124.20

TOTAL FEES	\$38,976.30
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$38,976.30



Submit Via E-Mail Only –  
Do Not Send Hard Copy

March 22, 2021

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

Attorneys at Law  
Administrative Office  
50 International Drive  
Patewood IV, Suite 200  
Greenville, SC 29615  
Telephone: (864) 241-1801  
Facsimile: (864) 241-1908  
[www.ogletreedeakins.com](http://www.ogletreedeakins.com)

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

PERSONAL AND CONFIDENTIAL

Bill # 90393901  
Client.Matter # 029879.000036

Re: **Hire Counsel v. Andrew Delaney (USDC SDNY)**  
**ALLIANZ Claim No. SF-USFF03539920**  
**1:20-cv-03178-LJL**

For professional services rendered through February 28, 2021, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$8,024.40
Expenses.....	\$0.00
<b>Total Due This Bill.....</b>	<b>\$8,024.40</b>

<u>Wire Payments</u>		<u>ACH Payments</u>		<u>Check Payments</u>	
----------------------	--	---------------------	--	-----------------------	--

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: / DUNS#:

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



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03/22/21  
Bill No. 90393901  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)  
ALLIANZ Claim No. SF-USFF03539920  
1:20-cv-03178-LJL

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For professional services rendered through February 28, 2021

Date	Initials	Description	Hours	Amount
02/01/21	MN	Review order from the Court of Appeals appearance and c [REDACTED]	0.80	320.40
02/01/21	MN	Update settlement statement for 2/10/21 mediation.	1.60	640.80
02/02/21	MN	Final revisions and proof of mediation statement and [REDACTED]	0.30	120.15
02/04/21	MN	Analysis and developments of arguments for opposition to Delaney's appeal under FRCP 54 and 28 USC 1292(b).	1.20	480.60
02/04/21	MN	Confer with Valerie Weiss about opposing Delaney's appeal [REDACTED] and motion to dismiss in the Second Circuit.	0.40	160.20
02/04/21	VLW	Research case law regarding [REDACTED]	1.40	485.10
02/04/21	VLW	Draft letter brief in opposition of motion for defendant to proceed in forma pauperis on appeal.	1.20	415.80
02/05/21	MN	Correspondence with [REDACTED] about mediation statement; [REDACTED]	0.20	80.10
02/05/21	MN	Finalize mediation statement, prepare and add exhibits, execute mediation confidentiality agreement, and same documents to mediator.	0.60	240.30
02/09/21	MN	Review Delaney's Chapter 7 bankruptcy petition.	0.60	240.30
02/09/21	MN	Multiple phone calls with [REDACTED]	0.40	160.20



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Bill No. 90393901  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
02/09/21	MN	Draft letter to the court informing of suggestion of bankruptcy, prepare exhibits, and file same.	0.50	200.25
02/09/21	MN	Correspondence to mediator informing of suggestion of bankruptcy.	0.20	80.10
02/09/21	MN	Review Delaney's counsel's letter in response to suggestion of bankruptcy; send same to [REDACTED]	0.30	120.15
02/09/21	MN	Analyze impact of Delaney's Chapter 7 bankruptcy filing on [REDACTED]	0.60	240.30
02/09/21	MN	Phone calls and emails with [REDACTED]	0.40	160.20
02/09/21	MN	Emails and phone calls with [REDACTED] about [REDACTED]	0.40	160.20
02/09/21	MN	Phone call with Delaney's Counsel, Robert Rotman, about bankruptcy filing.	0.20	80.10
02/09/21	VLW	Analyze and review Delaney's petition for bankruptcy in light of filing motion to proceed in forma pauperis.,	0.10	34.65
02/10/21	MN	Appear at court ordered mediation.	0.70	280.35
02/10/21	MN	Review Plaintiff's letter filed with the Court about mediation not being held in light of bankruptcy filing.	0.20	80.10
02/10/21	MN	Appear and participate in [REDACTED] call between [REDACTED]	1.10	440.55
02/10/21	MN	Review and respond to email from [REDACTED] about strategy follow up questions based on [REDACTED]	0.30	120.15
02/11/21	MN	Draft letter to the Court as directed by January 29, 2021 order reporting on settlement status.,	0.30	120.15
02/11/21	MN	As requested by [REDACTED] further correspondence by phone and email with [REDACTED]	0.70	280.35
		follow up email to [REDACTED] enclosing prior briefings and Delaney's pending motion to dismiss.		
02/11/21	MN	Review [REDACTED]	0.70	280.35
		[REDACTED]		

Stephanos Zannikos.

Ogletree  
Deakins

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03/22/21  
Bill No. 90393901  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
02/18/21	MN	Review letter to the Court letter in accordance with Order dated January 29, 2021 instructing the parties to report by February 19, 2021 on the outcome of settlement discussions, and in regards to Defendant's request that the Court decide his motion to dismiss despite the automatic stay.	0.60	240.30
02/18/21	MN	Review [REDACTED]	0.80	320.40
02/19/21	MN	Phone call with [REDACTED]	0.40	160.20
02/19/21	MN	Follow up phone calls with [REDACTED] and next steps.	0.60	240.30
02/19/21	MN	Phone call with [REDACTED]	0.40	160.20
02/19/21	MN	Revise status letter [REDACTED] and file same.	0.20	80.10
02/20/21	MN	Strateqy call with [REDACTED]	0.70	280.35
02/22/21	MN	Further review case correspondence, Judge's order on sanctions, and Delaney's EDNY bankruptcy petition.	0.20	80.10
02/23/21	MN	Review Court's sua sponte order withdrawing motion to dismiss and same to [REDACTED]	0.20	80.10
02/25/21	MN	Review [REDACTED] and confer with [REDACTED]	0.20	80.10
02/26/21	MN	Review email from [REDACTED] enclosing voluminous [REDACTED]	0.30	120.15
02/26/21	MN	Review Delaney deposition transcript testimony [REDACTED]	0.40	160.20
Total Services:				20.40
				8,024.40

Ogletree  
Deakins

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03/22/21  
Bill No. 90393901  
029879.0000036-CRP

**Timekeeper Summary**

<b>Timekeeper</b>	<b>Title</b>	<b>Rate</b>	<b>Hours</b>	<b>Amount</b>
Michael Nacchio	Shareholder	400.50	17.70	7,088.85
Valerie L. Weiss	Associate	346.50	2.70	935.55

**Expenses**

<b>Description</b>		<b>Amount</b>
Computer Research-Westlaw	2.00 @ 0.00 ea.	0.00
Total Expenses		0.00

TOTAL FEES	\$8,024.40
TOTAL EXPENSES	\$0.00
TOTAL THIS BILL	\$8,024.40



Submit Via E-Mail Only –  
Do Not Send Hard Copy

OGLETREE, DEAKINS, NASH,  
SMOAK & STEWART, P.C.

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50 International Drive

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www.ogletreedeakins.com

April 30, 2021

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

PERSONAL AND CONFIDENTIAL

Bill # 90417483  
Client.Matter # 029879.000036

Re: Hire Counsel v. Andrew Delaney (USDC SDNY)  
ALLIANZ Claim No. SF-USFF03539920  
1:20-cv-03178-LJL

For professional services rendered through March 31, 2021, in connection with the above-referenced matter as outlined on the attached detailed billing sheets:

Fees .....	\$21,178.35
Expenses.....	\$140.00
<b>Total Due This Bill.....</b>	<b>\$21,318.35</b>

Wire Payments	ACH Payments	Check Payments
[REDACTED]	[REDACTED]	[REDACTED] PO Box 89 Columbia, SC 29202

Credit to Ogletree Deakins Nash Smoak & Stewart / Please include bill numbers / Federal Tax ID: [REDACTED] / DUNS#: [REDACTED]

**Payable upon receipt.** Direct inquiries to the billing attorney or the Account Services Department (864) 241-1801.  
If you would like to receive your bills via e-mail, please notify [Billing2@ogletreedeakins.com](mailto:Billing2@ogletreedeakins.com)



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04/30/21  
Bill No. 90417483  
029879.000036-CRP

Stephanos Zannikos  
Hire Counsel Legal and Review Management  
SZannikos@hirecounsel.com

Re: **Hire Counsel v. Andrew Delaney (USDC SDNY)**  
**ALLIANZ Claim No. SF-USFF03539920**  
**1:20-cv-03178-LJL**

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For professional services rendered through March 31, 2021

Date	Initials	Description	Hours	Amount
03/01/21	MN	Further review of [REDACTED] [REDACTED]	1.20	480.60
03/01/21	MN	Further review of [REDACTED]	0.20	80.10
03/10/21	MN	Review [REDACTED] [REDACTED] send same to [REDACTED] [REDACTED]	0.30	120.15
03/10/21	MN	Communications with [REDACTED] relating to [REDACTED]	0.50	200.25
03/11/21	MN	Phone calls with [REDACTED] about [REDACTED]	0.20	80.10
03/11/21	MN	Phone calls with [REDACTED]	0.30	120.15
03/18/21	MN	Communications with [REDACTED] relating to [REDACTED] [REDACTED]	1.30	520.65
03/18/21	MN	Review newly filed NY Supreme Court Complaint and develop litigation course of action [REDACTED] [REDACTED]	1.40	560.70
03/18/21	VLW	Analyze and review recently filed New York State Court Complaint [REDACTED] [REDACTED]	1.80	623.70
03/18/21	VLW	Analyze and review New York State Court law regarding [REDACTED] [REDACTED]	1.50	519.75
03/19/21	MN	Review procedure [REDACTED] during COVID-19.	0.30	120.15
03/19/21	MN	Continue analysis and development of legal and factual arguments for [REDACTED] [REDACTED].	1.30	520.65

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04/30/21  
Bill No. 90417483  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
03/19/21	MN	Participate in strategy call with John Butts at Wilmer Hale and [REDACTED] regarding Order to Show Cause to seal new NY Complaint; including follow up email [REDACTED]	1.10	440.55
03/19/21	MN	Phone call with [REDACTED] about outcome of [REDACTED] call and next steps.	0.40	160.20
03/19/21	VLW	Begin drafting statement of facts and procedural history of Brief in Support of Motion to Seal portions of the Complaint due to confidential and privileged information.	4.30	1,489.95
03/19/21	VLW	Call with [REDACTED] and Michael Nacchio, Esq., regarding filing order to show cause to seal portions of the Verified Complaint.	0.30	103.95
03/21/21	VLW	Research New York case law and regulations regarding motion to seal portions of the Complaint.	2.60	900.90
03/21/21	VLW	Begin drafting legal argument section of the Brief in Support of Motion to Seal portions of the Complaint, including privileged and confidential information.	2.20	762.30
03/22/21	MN	Review and revise Brief in Support of Order to Show Cause to Seal and Attorney Affirmation in Support.	3.40	1,361.70
03/22/21	VLW	Revise Brief in Support of Order to Show Cause to Seal paragraphs five through eleven of the NY State Court Verified Complaint to include additional case law and facts/procedural history.	3.10	1,074.15
03/23/21	MN	Further review and revise draft Brief in Support of Order to Show Cause to Seal/redact new NY Complaint, Attorney Affirmation in Support, and Proposed Order to Show Cause; includes attendant review of case law and conferral with Valerie Weiss.	4.40	1,762.20
03/23/21	VLW	Prepare Notification of Order Extending the Restriction of the Verified Complaint while order to show cause is pending.	0.20	69.30
03/24/21	MN	Teleconference on Order to Show Cause with [REDACTED] and Valerie Weiss, including relating correspondence.	0.90	360.45
03/24/21	MN	Further review and revisions of Order to Show Cause papers, based on [REDACTED] requests.	2.10	841.05
03/24/21	MN	Prepare email notification to Andrew Delaney giving required statutory notice of intent to move for Order	0.20	80.10

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04/30/21  
Bill No. 90417483  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
03/24/21	VLW	to Show Cause with temporary restraints tomorrow. Revise Memorandum of Law in Support of Order to Show Cause.	2.90	1,004.85
03/24/21	VLW	Draft Affirmation of [REDACTED] in Support of Order to Show Cause.	0.60	207.90
03/24/21	VLW	Prepare the Notification of Extended Restriction of the Complaint to file with the Court.	0.30	103.95
03/24/21	VLW	Review and revise proposed order to show cause.	0.40	138.60
03/24/21	VLW	Gather and prepare exhibits to include with Declaration of Michael Nacchio, Esq., in Support of Order to Show Cause.	0.90	311.85
03/24/21	VLW	Revise Affirmation of Michael Nacchio, Esq., in Support of Order to Show Cause.	0.70	242.55
03/24/21	VLW	Call with [REDACTED]	0.30	103.95
03/25/21	MN	Final review and revisions to Order to Show Cause papers based on additional [REDACTED] and related communications with Wilmer Hale and Stephanos Zannikos about same.	2.20	881.10
03/25/21	MN	Multiple phone calls to Chambers regarding motion status and urgency of Order to Show Cause, including follow up emails to [REDACTED]	0.40	160.20
03/25/21	MN	Analysis of seeking [REDACTED]	0.60	240.30
03/25/21	MN	Review granted Order to Show Cause, redact Complaint, file same.	0.80	320.40
03/25/21	MN	Phone and email communications with [REDACTED] regarding [REDACTED]	0.80	320.40
03/25/21	MN	Prepare email to [REDACTED]	0.40	160.20
03/25/21	MN	Electronically file Order to Show Cause, supporting Memorandum of Law, and Affirmations of [REDACTED]	1.10	N/C
03/25/21	MN	Review Clerk's notifications in response to Order to	1.30	N/C

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04/30/21  
Bill No. 90417483  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
		Show Cause filing; draft and file Affirmation of Service, draft and file Affirmation pursuant to 22 NYCRR § 202.7, as directed by clerk.		
03/26/21	MN	Review Court docket and correspondence with Clerk's office in continued efforts to effectuate the sealing of the Complaint per yesterday's Order.	0.30	120.15
03/26/21	MN	Continued correspondence with [REDACTED] about [REDACTED]	0.20	80.10
03/26/21	VLW	Draft notification of sealing the Complaint to file with the court, as requested by the court clerks.	0.30	103.95
03/29/21	MN	Review Delaney's letter to the Judge request order to show; mull response and correspond about same with [REDACTED]	0.40	160.20
03/29/21	MN	Phone call with [REDACTED] regarding [REDACTED]	0.40	160.20
03/29/21	MN	Review [REDACTED] [REDACTED] review [REDACTED]	1.00	400.50
03/29/21	MN	Review [REDACTED] [REDACTED] [REDACTED] [REDACTED] with SDNY matter and NY Supreme Court matter.	1.40	560.70
03/30/21	MN	Participate in strategy call with [REDACTED] [REDACTED] regarding [REDACTED]	0.60	240.30
03/30/21	MN	Confer with Valerie Weiss about [REDACTED] and [REDACTED]	0.20	80.10
03/30/21	MN	In preparation for client team call with [REDACTED] [REDACTED] and review [REDACTED]	1.00	400.50



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04/30/21  
Bill No. 90417483  
029879.000036-CRP

Date	Initials	Description	Hours	Amount
03/30/21	MN	Review [REDACTED] [REDACTED] [REDACTED]	0.70	280.35
03/30/21	MN	Review [REDACTED] [REDACTED] [REDACTED]	0.20	80.10
03/30/21	MN	Review and respond to email from [REDACTED] enclosing requested copies of [REDACTED]	0.20	80.10
03/31/21	MN	Numerous phone calls and email correspondence with [REDACTED] about [REDACTED]	1.50	600.75
03/31/21	MN	Confer with [REDACTED] about HC2 data Investigation.	0.30	120.15
03/31/21	MN	Analysis of [REDACTED] [REDACTED]	0.40	160.20
Total Services:			58.30	21,178.35

#### Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Michael Nacchio	Shareholder	400.50	33.50	13,416.75
Michael Nacchio	Shareholder	0.00	2.40	N/C
Valerie L. Weiss	Associate	346.50	22.40	7,761.60

#### Expenses

Description	Amount
VENDOR: U. S. Bank INVOICE#: 4504738303301605 DATE: 3/30/2021	95.00
Jill E. Glassman - Filing Fees - Fee for e-filing request for Judicial Intervention. Valerie Weiss #: 5563 on 03/18/21	
VENDOR: U. S. Bank INVOICE#: 4515619204071302 DATE: 4/7/2021	45.00
Jill E. Glassman - Filing Fees - Fee for e-filing Order to Show Cause. Michael Nacchio #: 4761 on 03/25/21	
Total Expenses	140.00

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04/30/21  
Bill No. 90417483  
029879.000036-CRP

TOTAL FEES	\$21,178.35
TOTAL EXPENSES	\$140.00
TOTAL THIS BILL	\$21,318.35

**KASOWITZ BENSON TORRES LLP**

1633 BROADWAY  
NEW YORK, NEW YORK 10019-6799  
212-506-1700  
FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2005911 - **REVISED**

**March 25, 2021**

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of July 2020  
as reflected on the attached printout.

Fees	\$153,922.50
Less Credit for K. Moody Rate	(3,270.00)
Less 10% Discount	(15,065.25)
Total Fees	\$135,587.25
Disbursements	\$2,686.31
Current Amount Due	\$138,273.56
Less Payment	(20,104.91)
<b>TOTAL AMOUNT DUE</b>	<b>\$118,168.65</b>

KASOWITZ BENSON TORRES LLP  
1633 BROADWAY  
NEW YORK, NEW YORK 10019-6799  
212-506-1700  
FACSIMILE: 212-506-1800

FED. ID. 13-3720397

HC2, Inc. d/b/a Hire Counsel  
Joan Davison  
225 West Washington Street  
Chicago, IL 60606

INVOICE NO.: 2004998 - REVISED

March 25, 2021

RE: Hire Counsel v. Delaney

FOR PROFESSIONAL SERVICES rendered  
through the month of May 2020  
as reflected on the attached printout

Fees	\$470,904.00
Less Credit for K. Moody Rate	(33,960.00)
Less 10% Discount	(43,694.40)
Total Fees	\$393,249.60
Disbursements	\$11,645.49
Current Amount Due	\$404,895.09
Less Payments	(425,000.00)
<b>Balance of Retainer ***</b>	<b>(20,104.91)</b>
<b>*** to be applied on inv. 2005911</b>	

***The Killian Firm PC***

555 Route 1 South  
Suite 430  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Sep 10, 2020

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7051

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Aug-13-20	Review client documents; telephone call client	0.60	240.00	K
Aug-21-20	Review file; e-mail to [REDACTED] with proposed language to [REDACTED]	0.30	120.00	K
Aug-24-20	Review and respond to [REDACTED] inquiry	0.10	40.00	K
	Totals	1.00	\$400.00	

**Total Fees, Disbursements** **\$400.00**

Previous Balance	\$0.00
Previous Payments	\$0.00

**Balance Due Now** **\$400.00**

**The Killian Firm PC**

555 Route 1 South  
Suite 430  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel Oct 12, 2020  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7127

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Sep-08-20	E-mail client re: responding to [REDACTED]	0.20	80.00	K
Sep-10-20	Telephone call [REDACTED] including preparation	0.20	80.00	K
Sep-28-20	Review [REDACTED] and file; telephone call [REDACTED] [REDACTED] re: preparing letter [REDACTED]	1.00	400.00	K
Totals		1.40	\$560.00	

**Total Fees, Disbursements** \$560.00

Previous Balance	\$400.00
Previous Payments	\$0.00

**Balance Due Now** \$960.00

***The Killian Firm PC***

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Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Nov 10, 2020

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7179

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-02-20	Review correspondence from [REDACTED] research applicable law on coverage for [REDACTED]	1.60	640.00	K
Oct-09-20	[REDACTED] telephone call [REDACTED] re: same Review file and various correspondence regarding underlying claim; e-mail [REDACTED] re: same	1.00	400.00	K
Oct-13-20	Telephone call [REDACTED] re: strategy; e-mail [REDACTED] requesting conference	0.30	120.00	K
Oct-15-20	Review file and prepare for [REDACTED] with [REDACTED]	1.00	400.00	K
Oct-16-20	Conference call with [REDACTED] re: claim Telephone call [REDACTED] outline letter to [REDACTED]	0.40	160.00	K
Oct-19-20	Status report to [REDACTED]	0.20	80.00	K
Oct-20-20	Review [REDACTED] documents and draft letter to [REDACTED]	2.20	880.00	K
Oct-22-20	Review [REDACTED] and [REDACTED] documents; prepare correspondence to [REDACTED] regarding [REDACTED] e-mail [REDACTED] regarding same	3.00	1,200.00	K
Oct-26-20	Review and revise [REDACTED] to [REDACTED] (including review of additional documents); e-mail client re: same	1.50	600.00	K
Totals		11.70	\$4,680.00	

<b>Total Fees, Disbursements</b>	<b>\$4,680.00</b>
Previous Balance	\$960.00
Previous Payments	\$0.00
<b>Balance Due Now</b>	<b>\$5,640.00</b>

***The Killian Firm PC***

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Dec 11, 2020

Attention: Stephanos Zannikos, Esq.

File #: 20200050  
Inv #: 7255

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Nov-20-20	Review and respond to correspondence from [REDACTED] [REDACTED] respond to correspondence from [REDACTED] [REDACTED] regarding reservation of rights	1.10	440.00	K
	Totals	1.10	\$440.00	

**Total Fees, Disbursements** \$440.00

Previous Balance	\$5,640.00
Previous Payments	\$5,640.00

**Balance Due Now** \$440.00

***The Killian Firm PC***

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel Jan 07, 2021  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7316

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Dec-03-20	Telephone call [REDACTED] re: responding to [REDACTED] correspondence	0.30	120.00	K
Dec-29-20	Review [REDACTED] review [REDACTED] review correspondence from [REDACTED] [REDACTED] review correspondence from [REDACTED]	2.20	880.00	K
Dec-31-20	Study [REDACTED] and documents from [REDACTED] research of law re: [REDACTED]	3.00	1,200.00	K
	Totals	5.50	\$2,200.00	

**Total Fees, Disbursements** \$2,200.00

Previous Balance	\$440.00
Previous Payments	\$0.00

**Balance Due Now** \$2,640.00

***The Killian Firm PC***

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Feb 09, 2021

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7382

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Jan-04-21	E-mail to [REDACTED] re: [REDACTED]	0.50	200.00	K
Jan-21-21	Review prior correspondence, [REDACTED] documents, and [REDACTED] draft e-mail to [REDACTED]	2.80	1,120.00	K
Jan-29-21	Correspondence with [REDACTED] re: [REDACTED] [REDACTED] Telephone call [REDACTED] re: [REDACTED] [REDACTED] re: same	0.50 1.10	200.00 440.00	K
	Totals	4.90	\$1,960.00	

**Total Fees, Disbursements** \$1,960.00

Previous Balance	\$2,640.00
Previous Payments	\$2,640.00

**Balance Due Now** \$1,960.00

***The Killian Firm PC***  
555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph:(732)912-2100

Fax(732)912-2101

HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
11th Floor  
New York, NY 10017

Mar 09, 2021

Attention: Stephanos Zannikos, Esq. File #: 20200050  
Inv #: 7449

RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Feb-03-21	E-mails with [REDACTED] re: [REDACTED]	0.10	40.00	K
Feb-11-21	Review file to prepare for [REDACTED] call; e-mails [REDACTED] re: coverage issues	1.00	400.00	K
Feb-12-21	Strategy call with client	0.60	240.00	K
Feb-19-21	Review file; review correspondence from [REDACTED] draft memo to [REDACTED] regarding [REDACTED]	2.00	800.00	K
Feb-21-21	Draft and send letter to [REDACTED] [REDACTED] regarding claim	2.50	1,000.00	K
Feb-22-21	Followup e-mails with [REDACTED] re: [REDACTED]	0.20	80.00	K
Feb-23-21	Conference call with [REDACTED] re: [REDACTED]	0.30	120.00	K
	E-mails with client re: outstanding fees of underlying counsel	0.10	40.00	K
Totals		6.80	\$2,720.00	

<b>Total Fees, Disbursements</b>	<b>\$2,720.00</b>
Previous Balance	\$1,960.00
Previous Payments	\$0.00
<b>Balance Due Now</b>	<b>\$4,680.00</b>

[REDACTED]

**The Killian Firm, P.C.**

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph: (732) 912-2100  
Fax: (732) 912-2101

Apr 12, 2021

HC2, Inc. d/b/a Hire Counsel File #: 20200050  
360 Lexington Avenue Inv #: 7517  
11th Floor  
New York, NY 10017  
Attention: Stephanos Zannikos, Esq.  
RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Mar-03-21	Correspondence with Aon regarding claim	0.10	40.00	K
Mar-05-21	Telephone call with [REDACTED] and [REDACTED] (including preparation for call) re: [REDACTED]	0.50	200.00	K
Mar-09-21	Review and respond to client e-mail re: claim strategy	0.20	80.00	K
Mar-12-21	Review Aon correspondence; e-mail S. Zannikos [REDACTED]	0.20	80.00	K
Mar-15-21	E-mail [REDACTED] re: [REDACTED]	0.10	40.00	K
	Correspondence with [REDACTED] re: [REDACTED]	0.20	80.00	K
Mar-17-21	Telephone call [REDACTED] (including preparation)	0.30	120.00	K
Mar-18-21	Review and respond to spreadsheet and claim correspondence from [REDACTED]	0.50	200.00	K
Mar-24-21	Review spreadsheets from client; conference with [REDACTED] to review [REDACTED]	0.70	280.00	K
Mar-25-21	Review spreadsheets; correspondence to [REDACTED]	0.50	200.00	K
Mar-26-21	Correspondence to [REDACTED] re: [REDACTED] (including review of [REDACTED])	0.20	80.00	K
Totals		3.50	\$1,400.00	

<b>Total Fees &amp; Disbursements</b>	<b>\$1,400.00</b>
Previous Balance	\$4,680.00
Previous Payments	\$0.00
<b>Balance Due Upon Receipt</b>	<b>\$6,080.00</b>

[REDACTED]

**The Killian Firm, P.C.**

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph: (732) 912-2100  
Fax: (732) 912-2101

May 11, 2021

HC2, Inc. d/b/a Hire Counsel File #: 20200050  
360 Lexington Avenue Inv #: 7578  
11th Floor  
New York, NY 10017  
Attention: Stephanos Zannikos, Esq.  
RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Apr-08-21	Review documents forwarded by client	0.40	160.00	K
Apr-19-21	Telephone call [REDACTED] and [REDACTED] regarding [REDACTED] (including preparation)	0.40	160.00	K
Apr-20-21	Review and respond to e-mails from [REDACTED]	0.10	40.00	K
Apr-29-21	Review letter from [REDACTED] telephone call [REDACTED]	0.60	240.00	K
Apr-30-21	Review latest [REDACTED] letter and begin drafting response	1.00	400.00	K
Totals		2.50	\$1,000.00	

**Total Fees & Disbursements** \$1,000.00

Previous Balance \$6,080.00

Previous Payments \$1,960.00

**Balance Due Upon Receipt** \$5,120.00

[REDACTED]

**The Killian Firm, P.C.**

555 Route 1 South  
Suite 420  
Iselin, New Jersey 08830

Ph: (732) 912-2100  
Fax: (732) 912-2101

Jun 08, 2021

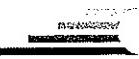
HC2, Inc. d/b/a Hire Counsel File #: 20200050  
360 Lexington Avenue Inv #: 7636  
11th Floor  
New York, NY 10017  
Attention: Stephanos Zannikos, Esq.  
RE: Delaney EPLI Matter

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
May-06-21	Review prior correspondence with [REDACTED] prepare response to most recent letter; e-mail [REDACTED] re: same	2.00	800.00	K
May-11-21	Revise letter to [REDACTED] review documents from [REDACTED] with respect to same; e-mail to [REDACTED] with respect to same	0.90	360.00	K
May-14-21	Review file and revise and edit letter to [REDACTED] e-mail [REDACTED] re: same	1.00	400.00	K
May-17-21	Review, finalize and send letter to [REDACTED]	0.50	200.00	K
May-24-21	Review and respond to [REDACTED] from [REDACTED] re: [REDACTED]	0.10	40.00	K
May-26-21	Review file and prior claim correspondence; telephone conference [REDACTED] send status [REDACTED] to [REDACTED]	1.00	400.00	K
Totals		5.50	\$2,200.00	

Total Fees & Disbursements \$2,200.00

Previous Balance \$5,120.00  
Previous Payments \$4,120.00

Balance Due Upon Receipt \$3,200.00



**SPECTOR &  
EHRENWORTH, P.C.**  
*Attorneys at Law*

30 Columbia Turnpike, Florham Park, New Jersey 07932-2261      973.593.4800      Fax: 973.593.4848

Taxpayer Identification No. 22-3483515

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HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
Suite 1100  
New York, NY 10017  
Attention: Stephanis Zannikos, Esq.

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April 7, 2021

For legal services rendered through March 31, 2021  
in connection with the following matter:

Invoice No. 20210095

*Andrew Delaney, Debtor*

Invoice Summary

	<u>Amount</u>
Total amount of this bill	\$17,882.62
Balance due	\$17,882.62

HC2, Inc. d/b/a Hire Counsel

April 7, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

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Professional services:

			<u>Hours</u>	<u>Amount</u>
03/11/21	DAG	Review filed documents of A. Delaney concerning matter; confer with BDS	0.30	135.00
	DAG	Review e-mails exchanged with S. Zannikos of Mestel re: new matter (multiple); review (briefly) district court and bankruptcy filings; confer with BDS; retrieve documents from both cases on PACER	0.80	360.00
	BDS	E-mail messages from and to S. Zannikos re: new matter (multiple); review bankruptcy filing	0.50	287.50
03/12/21	DAG	Preparation of list of issues to discuss; t/c/w S. Zannikos and BDS re: prospective new matter for HC2; revise BDS's e-mail to S. Zannikos	0.70	315.00
	BDS	Telephone conference with S. Zannikos and DAG; e-mail to S. Zannikos	0.50	287.50
03/15/21	ALL	Preparation of Notice of appearance; office conference with DAG re: same	0.20	32.00
	DAG	E-mail message from S. Zannikos re: debtor's motion to dismiss; review PACER, retrieve and review motion to dismiss, notice of new address and amended schedules; review bankruptcy petition; evaluate grounds to oppose motion to dismiss; confer with BDS re: grounds to oppose motion to dismiss; review (briefly) applicable law re: motion to dismiss; e-mail message to S. Zannikos re: next steps, motion to dismiss	1.80	810.00
	BDS	E-mail messages from and to S. Zannikos; discuss with DAG	0.40	230.00
03/16/21	ALL	Preparation of Opposition to the Debtor's Motion to Dismiss; office conference with DAG re: same	0.20	32.00

HC2, Inc. d/b/a Hire Counsel

April 7, 2021  
Page 3

Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

			Hours	Amount
03/16/21	DAG	E-mail messages from (2) and to S. Zannikos; confer with BDS; review dockets in Delaney v. Delaney and Delaney v. Sullivan & Cromwell lawsuits; briefly review filed pleadings and papers in pending lawsuits; e-mail message to G. Messer with introduction, discuss undisclosed information; electronically file notice of appearance	2.00	900.00
	BDS	E-mail message from S. Zannikos; discuss with DAG; review additional e-mails exchanged with him, with G. Messer, and with A. Delaney	0.50	287.50
03/17/21	ALL	Continued preparation of the Opposition to Debtor's Motion to Dismiss	0.40	64.00
	DAG	E-mail messages from and to S. Zannikos re: new lawsuit filed by A. Delaney, my t/c/w G. Messer; review NY ecourts (briefly) re: new lawsuit (not available online yet); e-mail messages from and to (2) G. Messer re: new lawsuit filed, request transcript from meeting of creditors and asset report; telephone conference with G. Messer re: introduction, pending lawsuits, status of bankruptcy case, next steps	1.40	630.00
	BDS	E-mail messages exchanged S. Zannikos; discuss with DAG; review e-mails exchanged with G. Messer; review e-notice from court	0.50	287.50
03/18/21	DAG	E-mail messages from (4) and to S. Zannikos re: [REDACTED] [REDACTED]; t/c/w (2) S. Zannikos re: [REDACTED] [REDACTED]; receive and review (briefly) NY Supreme Court complaint; t/c/w G. Messer re: need to seal complaint; e-mail message from G. Messer with attached Lexis report and transcript of meeting of creditors; receive and review notice of assets, notification list; receive and review (briefly) order dismissing counterclaims, amended counterclaims; legal research re: [REDACTED] [REDACTED]; confer with BDS re: [REDACTED] [REDACTED], instructions to ALL re: [REDACTED] [REDACTED]	3.10	1,395.00

HC2, Inc. d/b/a Hire Counsel

April 7, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

			Hours	Amount
03/18/21	BDS	E-mail messages from S. Zannikos (3); discuss with DAG re: [REDACTED]	0.50	287.50
03/19/21	ALL	Office conference with DAG re: [REDACTED] [REDACTED] office conference with DAG re: findings	0.50	80.00
	ALL	Preparation of Motion for Extension of Time; office conference with DAG re: same	0.60	96.00
	DAG	Review file, search report and transcript of meeting of creditors; e-mail message to S. Zannikos [REDACTED]; instructions to ALL re: [REDACTED]; receive and review [REDACTED] e-mail messages from (2) and to (2) S. Zannikos re: [REDACTED]	1.70	765.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.40	230.00
03/22/21	ALL	Check [REDACTED] [REDACTED]	0.10	16.00
	DAG	Preparation of pleadings -- motion to extend time to file discharge objection and dischargeability determination	2.40	1,080.00
03/23/21	DAG	E-mail messages from and to S. Zannikos re: [REDACTED]	0.20	90.00
	BDS	Review e-mails exchanged with S. Zannikos	0.20	115.00
03/24/21	ALL	Check [REDACTED] [REDACTED]; preparation of Proof of Claim [REDACTED]	0.50	80.00
	DAG	Preparation of pleadings -- motion for extension of time to file discharge and dischargeability complaint; instructions to ALL for preparation of proof of claim; legal research re: [REDACTED]	4.60	2,070.00

HC2, Inc. d/b/a Hire Counsel

April 7, 2021  
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Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

			Hours	Amount
03/25/21	DAG	Confer with BDS re: [REDACTED]; preparation of motion for extension of time; preparation of opposition to motion to dismiss; e-mail message to S. Zannikos [REDACTED]	5.10	2,295.00
		[REDACTED] with [REDACTED] research [REDACTED] and [REDACTED] filing; e-mail message to S. Zannikos re: [REDACTED] S. Zannikos re: [REDACTED]; legal research re: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] preparation of motion for extension of time; preparation of opposition to motion to dismiss; e-mail message to S. Zannikos [REDACTED] [REDACTED]		
BDS		Telephone conference with DAG re: [REDACTED] review e-mails exchanged with S. Zannikos; review and revise motion for extension of time and opposition to motion to dismiss	1.00	575.00
03/26/21	JCS	Download documents from PACER and attach to case record	0.30	21.00
ALL		E-mail message tp S. Zannikos [REDACTED] [REDACTED] [REDACTED]	0.10	16.00
ALL		Revision to the cert. of service for the Motion for Extension of Time to Object; check [REDACTED] [REDACTED] correspondence drafted to Judge Mazer-Marino encl. courtesy copy of Motion for Extension of Time to Object; correspondence drafted to Judge Mazer-Marino encl. courtesy copy of Opposition to Debtor's Motion to Dismiss Case; revision to certificates of services for the Motion for Extension of Time to Object and the Opposition to Debtor's Motion to Dismiss Case; preparation of cover page for the exhibits to the Motion for Extension of Time to Object and the Opposition to Debtor's Motion to Dismiss Caseattention to service of both the Motion for Extension of Time to Object and the Opposition to Debtor's Motion to Dismiss Case	3.30	528.00

HC2, Inc. d/b/a Hire Counsel

April 7, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

			<u>Hours</u>	<u>Amount</u>
03/26/21	DAG	Revision to, redraft opposition to motion to dismiss and motion for extension of time; receive and review G. Messer's opposition to motion to dismiss, motion for extension of time to object to discharge; t/c/w S. Zannikos re: [REDACTED] redraft motion and opposition papers, certifications; preparation of proposed form of order; revise and redraft certificate of service; e-mail message to trustee's attorneys re: error in their affidavit of service; electronically file motion for extension of time and opposition to motion to dismiss; e-mail message to and from (multiple) S. Zannikos [REDACTED]	4.80	2,160.00
	BDS	Office conference with DAG re: [REDACTED] review e-mails exchanged with S. Zannikos	0.50	287.50
03/29/21	DAG	Receive and review chapter 7 trustee's paper copies of motion papers, review exhibits	0.20	90.00
03/30/21	ALL	Preparation of supplemental certificates of service for the Motion for an extension of time and the opposition to debtor's motion to dismiss; service of same	0.20	32.00
	DAG	Receive and review [REDACTED] retrieve and review [REDACTED] instructions to ALL re: [REDACTED] electronically file 2 supplemental certificates of service; e-mail message to S. Zannikos [REDACTED]	0.40	180.00
	BDS	Office conference with DAG re: status	0.20	115.00
03/31/21	DAG	Receive and review chapter 7 trustee's supplemental certificate of service re: objection and motion for extension of time	0.10	45.00
For professional services rendered			41.20	\$17,307.00

**HC2, Inc. d/b/a Hire Counsel**

April 7, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210095

Disbursements:

			<u>Qty/Price</u>	<u>Amount</u>
03/25/21	DAG	Research charges from 3rd party providers	1 79.92	79.92
03/26/21	JCS	Postage	1 8.80	8.80
	JCS	Postage	18 7.70	138.60
	JCS	Postage	2 8.55	17.10
	JCS	Postage	1 8.25	8.25
	JCS	Postage	1 9.90	9.90
	JCS	Photocopies	1,870 0.15	280.50
03/30/21	JCS	Postage	1 8.55	8.55
	JCS	Photocopies	160 0.15	24.00
Total disbursements				\$575.62

## User Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Brian D. Spector, Esq.	5.20	575.00	\$2,990.00
Douglas A. Goldstein, Esq.	29.60	450.00	\$13,320.00
Abigail L. Lynch (Paralegal)	6.10	160.00	\$976.00
Jackie C. Sokol	0.30	70.00	\$21.00



**SPECTOR &  
EHRENWORTH, P.C.**  
*Attorneys at Law*

30 Columbia Turnpike, Florham Park, New Jersey 07932-2261      973.593.4800      Fax: 973.593.4848

Taxpayer Identification No. 22-3483515

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HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
Suite 1100  
New York, NY 10017  
Attention: Stephanis Zannikos, Esq.

May 5, 2021

For legal services rendered through April 30, 2021  
in connection with the following matter:

Invoice No. 20210132

*Andrew Delaney, Debtor*

Invoice Summary

	<u>Amount</u>
Previous balance	\$17,882.62
Total amount of this bill	\$13,948.94
Balance due	\$31,831.56

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

Professional services:

			<u>Hours</u>	<u>Amount</u>
04/01/21	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] [REDACTED] receive and review [REDACTED] [REDACTED] review [REDACTED] amended bankruptcy schedules); confer with BDS re: [REDACTED] [REDACTED] bankruptcy case		
	BDS	Receive and review e-mails exchanged with [REDACTED] and new complaint filed by Delaney; discuss with DAG	0.50	287.50
04/05/21	DAG	Receive and review [REDACTED] reply to our opposition to his motion to dismiss case; review file; e-mail messages to (2) and from (2) [REDACTED] re: [REDACTED] [REDACTED]	0.60	270.00
	BDS	Review debtor's response to objection to motion to dismiss; discuss with DAG; e-mails from and to [REDACTED]	0.40	230.00
04/06/21	DAG	Electronically file proof of claim, enter claim information into CM/ECF; e-mail message to [REDACTED] with filed proof of claim	0.20	90.00
	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] [REDACTED] review file (briefly) re: discussion re: [REDACTED] [REDACTED] legal research (briefly) re: [REDACTED] [REDACTED] t/c/w [REDACTED] and [REDACTED] re: strategy and next steps; e-mail message to [REDACTED] re: [REDACTED] [REDACTED]		
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.20	115.00
04/08/21	DAG	Review file, docket in preparation for hearing on debtor's motion to dismiss; telephonic appearance at hearing on motion to dismiss; e-mail messages from (2) and to [REDACTED] [REDACTED] re: [REDACTED] confer with BDS re: today's hearing; e-mail message to [REDACTED] re: [REDACTED]	2.50	1,125.00

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

Page 3

Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

			<u>Hours</u>	<u>Amount</u>
04/08/21	BDS	Receive and review e-mails exchanged with [REDACTED] t/c/w DAG re: results of hearing and strategy	0.40	230.00
04/09/21	DAG	E-mail message from [REDACTED] re: [REDACTED] research [REDACTED] e-mail messages [REDACTED] e-mail message to [REDACTED] with update, [REDACTED]	0.60	270.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.10	57.50
04/12/21	DAG	Receive and review A. Delaney's motion for relief from automatic stay; e-mail message to [REDACTED] with attached stay relief motion, [REDACTED] e-mail messages from 2 [REDACTED] e-mail messages to (2) [REDACTED] with [REDACTED]	1.10	495.00
	BDS	Review (brief) of Delaney's stay relief motion; review e-mails exchanged with [REDACTED]	0.40	230.00
04/13/21	DAG	E-mail message from [REDACTED] re: [REDACTED] [REDACTED] will respond later this week	[REDACTED]	[REDACTED]
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.10	57.50
04/14/21	ALL	Initial setup of letter to [REDACTED] re: Debtor's objection to our motion for an extension of time; e-mail same to [REDACTED]	0.20	32.00
	DAG	Receive and review A. Delaney's objection to our motion for extension of time to object to discharge; receive and review (briefly) order granting trustee's retention of counsel; confer with BDS re: status of case, debtor's objection to our motion, recommendations and next steps; review file re: filings and case status; receive and review A. Delaney's amended motion for relief from automatic stay; review docket on PACER re: status; correspondence drafted to [REDACTED] background, case progress and status, recommendations; e-mail messages from and to [REDACTED] review string of e-mails between [REDACTED] and [REDACTED]	2.70	1,215.00

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

			<u>Hours</u>	<u>Amount</u>
04/14/21	BDS	Review (brief) of objection to motion for extension; discuss with DAG; review and revise letter [REDACTED]	0.40	230.00
04/15/21	DAG	Receive and review docket notices from bankruptcy court re: A. Delaney's stay relief motion; review file in advance of call with [REDACTED] and [REDACTED] Zoom meeting with [REDACTED] and [REDACTED]	1.20	540.00
04/16/21	ALL	Set up reply to Debtor's opposition to Plaintiff's Motion to Extend Time; preparation of Certificate of Service for same	0.20	32.00
	DAG	Receive and review proposed stipulation between trustee and A. Delaney re: extension of time; receive and review stipulated order for extension of trustee's time to object to discharge; e-mail messages to and from [REDACTED] re: [REDACTED]  [REDACTED] preparation of reply in further support of motion for extension of time; electronically file reply papers; e-mail messages from and to [REDACTED] e-mail message to [REDACTED] with attached reply papers, prospect of discussion with A. Delaney's attorney	4.30	1,935.00
	DAG	Place a call to, and leave a message for, [REDACTED] re: whether to file reply to opposition to motion for extension of time	0.10	No Charge
	BDS	Receive and review notices from court re: trustee obtaining consensual extension of deadline; review e-mails exchanged with [REDACTED] review reply submission; review e-mails exchanged with [REDACTED]	0.70	402.50
04/19/21	DAG	E-mail messages from (2) and to (2) [REDACTED] re: [REDACTED]	0.20	90.00
	DAG	E-mail messages to (4) and from (3) [REDACTED] re: [REDACTED] I [REDACTED] t/c/w [REDACTED] re: [REDACTED]	2.30	1,035.00

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

			<u>Hours</u>	<u>Amount</u>
		[REDACTED] e-mail message from [REDACTED] [REDACTED] re: [REDACTED] confer with BDS re: [REDACTED] [REDACTED] review file in preparation for hearing on motion for extension of time		
04/19/21	BDS	Receive and review e-mails exchanged with [REDACTED]	0.20	115.00
04/20/21	ALL	Review formatting instructions for a EDNY Order; revision to Order for Extension of Time; format Order for Extension of time; office conferences with DAG re: same; run a redline of the Order for Extension of Time	0.50	80.00
DAG		E-mail messages from (2) and to (3) [REDACTED] re: [REDACTED] [REDACTED] review file (briefly) for today's motion hearing; telephonic court appearance for hearing on our motion for extension of time to object to discharge; e-mail messages from and to [REDACTED] re: [REDACTED] prepare redline of proposed order; instructions to [REDACTED] re: revision to order; e-mail message to [REDACTED] [REDACTED] re: [REDACTED] receive and review (briefly) debtor's unsigned amended schedules and statement of financial affairs; receive and review notice of adjournment of hearing on stay relief motion	2.80	1,260.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.20	115.00
04/21/21	DAG	E-mail message from [REDACTED] with approval of proposed form of order for extension of time; prepare pdf of order; upload pdf and docx forms of order to ECF	0.30	135.00
DAG		E-mail messages to and from [REDACTED] re: proposed form of order for extension of time; e-mail message to [REDACTED] [REDACTED] e-mail message from [REDACTED] re: [REDACTED] e-mail message to [REDACTED] re:	0.40	180.00

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

			Hours	Amount
04/21/21	BDS	Receive and review e-mails exchanged with [REDACTED]	0.20	115.00
04/22/21	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] e-mail messages to (3) and from (2) [REDACTED] re: [REDACTED] stay relief motion adjourned; receive and review (briefly) [REDACTED] [REDACTED] e-mail message to [REDACTED] with instructions for comprehensive search	0.80	360.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.20	115.00
04/23/21	DAG	E-mail messages from (2) [REDACTED] of [REDACTED] e-mail message to [REDACTED] re: [REDACTED]	0.20	90.00
04/26/21	DAG	E-mail messages from (2) and to [REDACTED] re: [REDACTED] receive and review order, as entered, extending HC2's time to object to discharge; e-mail messages to (2) [REDACTED] re: [REDACTED]	0.50	225.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.10	57.50
04/28/21	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] review (briefly)	0.30	135.00
	DAG	E-mail message from [REDACTED] receive and review [REDACTED] e-mail message to [REDACTED] re: [REDACTED]	0.60	270.00
04/29/21	DAG	E-mail message from [REDACTED] re: [REDACTED] e-mail message to [REDACTED]	0.20	90.00
04/30/21	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] e-mail messages to (3) and from (2) [REDACTED] re: [REDACTED] proceed with [REDACTED] payment	0.50	225.00

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

	<u>Hours</u>	<u>Amount</u>
SUBTOTAL:	[ 30.40 ]	13,886.50]

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

	Hours	Amount
For professional services rendered	30.40	\$13,886.50

Disbursements:

		Qty/Price
03/31/21	JCS Charges from the United States courts for Pacer service	1 46.70
04/16/21	JCS Postage	21 0.51
DAG	Research charges from 3rd party providers	1 5.03
SUBTOTAL:		<u>62.44</u>

HC2, Inc. d/b/a Hire Counsel

May 5, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210132

	<u>Amount</u>
Total disbursements	\$62.44

<u>User Summary</u>		Hours	Rate	Amount
Name				
Brian D. Spector, Esq.		4.10	575.00	\$2,357.50
Douglas A. Goldstein, Esq.		25.30	450.00	\$11,385.00
Douglas A. Goldstein, Esq.		0.10	0.00	\$0.00
Abigail L. Lynch (Paralegal)		0.90	160.00	\$144.00



SPECTOR &  
EHRENWORTH, P.C.  
*Attorneys at Law*

30 Columbia Turnpike, Florham Park, New Jersey 07932-2261      973.593.4800      Fax: 973.593.4848

Taxpayer Identification No. 22-3483515

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HC2, Inc. d/b/a Hire Counsel  
360 Lexington Avenue  
Suite 1100  
New York, NY 10017  
Attention: Stephanis Zannikos, Esq.

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June 4, 2021

For legal services rendered through May 31, 2021  
in connection with the following matter:

Invoice No. 20210183

*Andrew Delaney, Debtor*

Invoice Summary

	<u>Amount</u>
Previous balance	\$31,831.56
Total amount of this bill	\$16,962.00
5/18/2021 PAYMENT - THANK YOU	(\$7,882.62)
6/3/2021 PAYMENT - THANK YOU (Check No. ATA 1580)	(\$10,000.00)
Total payments and adjustments	(\$17,882.62)
Balance due	\$30,910.94

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Current	30 Days	60 Days	90 Days	120+ Days
\$16,962.00	\$13,948.94	\$0.00	\$0.00	\$0.00

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

Page 2

Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

Professional services:

			<u>Hours</u>	<u>Amount</u>
05/03/21	DAG	E-mail message from [REDACTED] e-mail message to [REDACTED] with update	0.10	45.00
05/07/21	DAG	E-mail message to [REDACTED] re: [REDACTED] [REDACTED] e-mail message from [REDACTED] re: [REDACTED] [REDACTED] e-mail messages from (2) [REDACTED] re: question regarding [REDACTED] e-mail message to [REDACTED] and [REDACTED] re: [REDACTED] Delaney's claims; e-mail messages from and to [REDACTED] re: [REDACTED] review [REDACTED] e-mail message to [REDACTED] with [REDACTED] and observations	2.20	990.00
05/10/21	DAG	E-mail messages from (3) and to (2) [REDACTED] re: [REDACTED] [REDACTED] e-mail message to [REDACTED] re: T [REDACTED]	0.50	225.00
05/13/21	DAG	E-mail messages from and to [REDACTED] re: [REDACTED] [REDACTED] re: [REDACTED] [REDACTED] review A. Delaney's [REDACTED] opposition to our motion for extension of time, reply in support of his motion to dismiss, preparation of memorandum [REDACTED] re: [REDACTED]		
05/14/21	DAG	E-mail messages to and from [REDACTED] re: [REDACTED] receive and review [REDACTED] [REDACTED] review file, bankruptcy schedules re: disclosures, [REDACTED]	2.20	990.00

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

Page 3

Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

			Hours	Amount
		re: [REDACTED] e-mail messages to (2) and from [REDACTED] re: [REDACTED]		
		[REDACTED] [REDACTED] e-mail messages to and from [REDACTED] re: [REDACTED]		
05/17/21	DAG	Preparation of pleadings -- ex parte motion for entry of order granting leave to serve Rule 2004 duces tecum subpoenas	4.30	1,935.00
05/18/21	ALL	Preparation of Rule 2004 ex parte application; certification in support, proposed order, and certification of service; office conference with DAG re: same; [REDACTED]	1.50	240.00
	DAG	Preparation of pleadings -- revise ex parte application, certification and order for Rule 2004 subpoenas duces tecum; legal research re: [REDACTED] [REDACTED] e-mail message to [REDACTED] with [REDACTED]	3.60	1,620.00
	BDS	Revision to Rule 2004 application papers	0.20	115.00
05/19/21	DAG	Revision to, ex parte application, certification and proposed order re: Rule 2004 subpoenas; e-mail messages from (2) and to [REDACTED] re: draft application, [REDACTED] research (briefly) [REDACTED] [REDACTED] e-mail message to chambers re: filing of ex parte application; preparation of Rule 2004 subpoenas duces tecum	2.10	945.00
	BDS	Receive and review e-mails exchanged with [REDACTED]	0.10	57.50
05/20/21	ALL	Preparation of Rule 2004 Subpoenas for the Financial Institutions identified in the Rule 2004 ex parte applications; office conferences with DAG re: same	0.90	144.00

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

Page 4

Re: Andrew Delaney, Debtor

Invoice No. 20210183

			Hours	Amount
05/20/21	DAG	E-mail message from Judge Mazer-Marino's chambers re: submission of ex parte application; finalize application for Rule 2004 subpoenas; electronically file ex parte application for order authorizing Rule 2004 subpoenas duces tecum; upload proposed order; review docket, retrieve filed copy of ex parte application; e-mail messages from and to [REDACTED] re: [REDACTED] [REDACTED] [REDACTED] e-mail messages from and to [REDACTED] re: [REDACTED] [REDACTED] [REDACTED] legal research re: [REDACTED] [REDACTED] e-mail messages from (5) and to (5) re: [REDACTED] [REDACTED] [REDACTED] receive and review, revise and redraft [REDACTED] [REDACTED]	4.40	1,980.00
05/21/21	ALL	Revision to Rule 2004 Subpoenas	0.20	32.00
	DAG	E-mail message from C. Lipan requesting pleadings; e-mail messages to (2) and from [REDACTED] re: C. Lipan's request for pleadings and case numbers; review file (briefly) re: C. Lipan's request; e-mail message from [REDACTED] receive and review (briefly); [REDACTED] redline revisions to [REDACTED] e-mail messages from (3) re: [REDACTED] review [REDACTED] retrieve and review [REDACTED] e-mail message to C. Lipan; review (briefly) status of [REDACTED] [REDACTED] revise and redraft subpoenas	2.30	1,035.00
05/25/21	DAG	E-mail messages from and to R. Blumenfeld re: service of objection to our ex parte application for Rule 2004 examination; receive notice of filing of objection; retrieve and review A. Delaney's objection; receive and review message from G. Herbst; place a call, leave a message for, G. Herbst; e-mail message from C. Lipan; telephone	2.40	1,080.00

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

		Hours	Amount
	conference with C. Lipan; e-mail messages to and from (2) [REDACTED] re: [REDACTED]		
	telephone conference with G. Herbst re: solicitation of offer to settle; telephone conference with [REDACTED] re: [REDACTED] A. Delaney's objection to our ex parte application, [REDACTED]		
05/26/21	ALL Download from PACER, save, and attach to the case record Debtor's Objection to the Proof of Claim filed by HC2; office conference with DAG re: finalizing Rule 2004 Subpoenas; correspondence drafted to Guaranteed Subpoena enclosing Subpoenas for service; finalize Subpoenas; scan and save to the case record the Subpoenas signed by DAG and the letter to Guaranteed Subpoena signed by DJE; e-mail letter and Subpoenas to Guaranteed Subpoena; forward same to [REDACTED] set up Complaint	1.20	192.00
DAG	Receive and review order granting Rule 2004 ex parte application with additional provisions; receive and review A. Delaney's objection to HC2's proof of claim; instructions to [REDACTED] re: objection to proof of claim; e-mail message to A. Delaney re: Rule 2004 order, claim objection; attention to preparation and execution of Rule 2004 subpoenas on financial institutions; e-mail messages from (2) [REDACTED] re: [REDACTED] re: preparation of adversary complaint; begin preparation of adversary complaint	1.80	810.00
BDS	Review (brief) of debtor's opposition to application to issue Rule 2004 subpoenas; review order; review objection to HC2's claim; review e-mails exchanged with [REDACTED] discuss with DAG	0.80	460.00
05/27/21	ALL Office conference with DAG re: [REDACTED] re: [REDACTED] save and attach to the case record same	0.20	32.00

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

		<u>Hours</u>	<u>Amount</u>
05/27/21	DAG Receive and review [REDACTED] re: [REDACTED] [REDACTED] e-mail messages to and from [REDACTED] with [REDACTED] preparation of adversary complaint; research (briefly) [REDACTED]		
05/28/21	ALL Review service of Subpoenas on Wells Fargo, E-Trade, and Bank of America; note that E-Trade and Bank of America would not accept service as it has to be served on CT Corporation; office conference with DAG; e-mail message to Guaranteed Subpoena re: service of E-Trade and Bank of America Subpoenas on CT Corporation; e-mail message from Guaranteed Subpoena re: they were unable to serve the Subpoena on Charles Schwab; e-mail to Guaranteed Subpoena re: service of Charles Schwab Subpoena on CT Corporation	0.40	64.00
DAG	Preparation of pleadings -- complaint objecting to discharge; review reports from Guaranteed Subpoena re: attempted service of Rule 2004 subpoenas; instructions to [REDACTED] re: service of Rule 2004 subpoenas; legal research (briefly) [REDACTED]	2.70	1,215.00
SUBTOTAL:		[ 40.00 ]	16,861.50]

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

	<u>Hours</u>	<u>Amount</u>
For professional services rendered	40.00	\$16,861.50

Disbursements:

	<u>Qty/Price</u>
05/28/21 DAG Research charges from 3rd party providers	1 100.50
	100.50

SUBTOTAL: [ 100.50 ]

HC2, Inc. d/b/a Hire Counsel

June 4, 2021

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Re: *Andrew Delaney, Debtor*

Invoice No. 20210183

	<u>Amount</u>
Total disbursements	\$100.50

<u>User Summary</u>		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Name				
Brian D. Spector, Esq.		1.10	575.00	\$632.50
Douglas A. Goldstein, Esq.		34.50	450.00	\$15,525.00
Abigail L. Lynch (Paralegal)		4.40	160.00	\$704.00